

Kami E. Quinn  
Gilbert LLP  
700 Pennsylvania Avenue, SE  
Suite 400  
Washington, DC 20003  
Tele: 202.772.2200  
Fax: 202.772.3333  
Email: quinnk@gilbertlegal.com

*Co-Counsel to the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants*

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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*In re:*

PURDUE PHARMA L.P., *et al.*,

Debtors.<sup>1</sup>

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Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**TWENTY-FIRST MONTHLY FEE STATEMENT OF GILBERT LLP,  
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL TO THE AD HOC  
COMMITTEE OF GOVERNMENTAL AND OTHER CONTINGENT LITIGATION  
CLAIMANTS FOR THE PERIOD JUNE 1, 2021 THROUGH JUNE 30, 2021**

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

<b>Name of Applicant:</b>	<b>Gilbert LLP</b>
<b>Authorized to provide professional services to:</b>	<b>Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants</b>
<b>Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:</b>	<b>December 2, 2019 (Docket #553)</b>
<b>Period for which compensation and reimbursement is sought:</b>	<b>June 1, 2021 through June 30, 2021</b>
<b>Amount of compensation sought as actual, reasonable, and necessary:</b>	<b>\$658,304.80 (80% of \$822,881.00)</b>
<b>Amount of expense reimbursement sought as actual, reasonable and necessary:</b>	<b>\$3,407.33 (100%)</b>
<b>This is a:</b>	<b>Monthly Fee Statement</b>

Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 365 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* entered by this Court on December 2, 2019 [Docket #553] (the “**Reimbursement Order**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket #529] (the “**Procedures Order**”), the law firm of Gilbert LLP (“**Gilbert LLP**”), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the “**AHC**”), hereby submits this twenty-first monthly fee statement (the “**Monthly Fee Statement**”) for legal services rendered and reimbursement for expenses incurred for the period commencing June 1, 2021 through June 30, 2021 (the “**Application Period**”).

**Itemization of Services Rendered and Expenses Incurred**

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Application Period by project category. As reflected on Exhibit A, Gilbert LLP incurred \$822,881.00 in fees during

the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 80% of such fees, totaling \$658,304.80.

2. Annexed hereto as **Exhibit B** is a chart of Gilbert LLP's professionals and paraprofessionals, including title, hourly rate, number of hours billed, and total fees of each attorney and paraprofessional who rendered services to the AHC in connection with these chapter 11 proceedings during the Application Period. The blended hourly rate of the attorneys during the Application Period is \$1,101.92. The blended hourly rate of paraprofessionals during the Application Period is \$260.25.

3. Annexed hereto as **Exhibit C** is the summary of reasonable and necessary expenses incurred during the Application Period. As reflected on Exhibit C, Gilbert LLP incurred \$3,407.33 in expenses during the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 100% of such expenses, totaling \$3,407.33.

4. Annexed hereto as **Exhibit D** are the time records of Gilbert LLP for the Application Period, organized by project category with a daily log detailing the time spent by each professional and an itemization of expenses.

#### **FILING AND SERVICE**

5. This Monthly Fee Statement will be filed and served in accordance with the directives in the Procedures Order.

6. Pursuant to the Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Monthly Fee Statement, serve via email, to the Notice Parties (as defined in the Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue.

7. If an objection is timely served pursuant to the Procedures Order, the Debtors shall be authorized and directed to pay Gilbert LLP the amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue. It shall not be sufficient to simply object to all fees and expenses.

WHEREFORE, Gilbert LLP respectfully requests compensation in the amount of \$658,304.80 (80% of \$822,881.00) and reimbursement of reasonable and necessary expenses incurred in the amount of \$3,407.33 (100%), for a total amount of \$661,712.13, for the Application Period.

Dated: August 3, 2021  
Washington, DC

Respectfully submitted,

**GILBERT LLP**

/s/ Kami E. Quinn

Kami E. Quinn  
700 Pennsylvania Avenue, SE  
Suite 400  
Washington, DC 20003  
Tele: 202.772.2200  
Fax: 202.772.3333  
Email: quinnk@gilbertlegal.com

*Counsel for the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants.*

**Exhibit A**

**Summary of Services by Category**

**SUMMARY OF SERVICES BY PROJECT CATEGORY**

<b>Project Code</b>	<b>Project Category</b>	<b>Hours Billed in Period</b>	<b>Fees for Period</b>
A001	Asset Analysis & Recovery	65.9	\$32,702.50
A004	Case Administration	12.8	\$6,619.00
A006	Employment / Fee Applications	2.2	\$638.00
A009	Meetings / Communications with AHC & Creditors	13.2	\$12,027.50
A019	Plan of Reorganization / Disclosure Statement	418.3	\$340,173.50
A020	Insurance Adversary Proceeding	524.6	\$430,720.50
		<b>1,037.0</b>	<b>\$822,881.00</b>

**Exhibit B**

**Summary of Compensation by Professional**

**SUMMARY OF COMPENSATION BY PROFESSIONAL**

<b>Name of Professional</b>	<b>Position / Year Admitted Practice</b>	<b>Hourly Billing Rate</b>	<b>Hours Billed for Period</b>	<b>Total Fees for Period</b>
Scott D. Gilbert	Partner / District of Columbia - 1979 U.S. Court of Appeals for the District of Columbia – 1980 U.S. Court of International Trade - 1984 U.S. Supreme Court - 1987 U.S. District Court for the District of Columbia – 2008 Cherokee Nation - 2017 U.S. Court of Federal Claims – 2019	\$1,700.00	36.4	\$61,880.00
Kami E. Quinn	Partner / Commonwealth of Virginia – 2000 District of Columbia – 2006 U.S. Court of Appeals for the Third Circuit – 2009	\$1,100.00	20.8	\$22,880.00
Richard Leveridge	Partner / District of Columbia – 1981 State of New York – 1997	\$1,400.00	96.0	\$134,400.00
Craig J. Litherland	Partner / State of Texas – 1983 Supreme Court of Texas – 1983 U.S. Court of Appeals Fifth Circuit – 1984 U.S. District Court for the Southern District of Texas – 1985 U.S. Federal Court for the Eastern District of Michigan – 1995 District of Columbia - 2001 U.S. District Court for the Western District of Texas – 2008 Cherokee Nation – 2017	\$1,400.00	34.5	\$48,300.00
Richard Shore	Partner / State of New York – 1988 District of Columbia – 1989 U.S. Court of Appeals for the Third Circuit – 2009 U.S. Court of Appeals for the Fourth Circuit – 2014 U.S. Court of Appeals for the Ninth Circuit – 2014 U.S. Court of Appeals for the Fifth Circuit – 2017 Cherokee Nation – 2017	\$1,350.00	83.5	\$112,725.00
Hunter Winstead	Partner / Commonwealth of Virginia – 2004 District of Columbia – 2006	\$950.00	6.3	\$5,985.00
Jason Rubinstein	Partner / State of Maryland – 2006 District of Columbia – 2007 U.S. District Court for the District of Maryland – 2007 U.S. District Court for the District of Columbia – 2011	\$800.00	100.4	\$80,320.00
Jenna Hudson	Partner / State of Maryland – 2010 State of Massachusetts – 2010 District of Columbia - 2011 U.S. District Court for the District of Maryland – 2011 U.S. Court of Appeals for the First Circuit – 2015 U.S. Supreme Court - 2016 Cherokee Nation – 2017 U.S. District Court for the District of Columbia – 2019	\$725.00	127.6	\$92,510.00



<b>Name of Professional</b>	<b>Position / Year Admitted Practice</b>	<b>Hourly Billing Rate</b>	<b>Hours Billed for Period</b>	<b>Total Fees for Period</b>
Emily Grim	Partner / Commonwealth of Pennsylvania – 2010 State of Illinois – 2010 District of Columbia – 2012 U.S. District Court for the District of Columbia - 2016 U.S. Court of Federal Claims – 2020	\$700.00	85.2	\$59,640.00
Dan Wolf	Partner / State of New York – 2011 District of Columbia – 2013 Southern District of New York – 2011 U.S. Court of Appeals for the Ninth Circuit – 2012	\$700.00	22.7	\$15,890.00
Mike Rush	Of Counsel / State of Delaware – 2007 District of Columbia - 2017	\$675.00	41.2	\$27,810.00
Heather Frazier	Associate / State of Florida – 2009 District of Columbia - 2017	\$675.00	37.9	\$25,582.50
Sarah Sradars	Associate / State of New York – 2016 District of Columbia – 2017	\$575.00	29.6	\$17,020.00
Alison Gaske	Associate / District of Columbia – 2016	\$575.00	55.6	\$31,970.00
Ethan Kaminsky	Associate / State of New York – 2018	\$500.00	65.0	\$32,500.00
Janet Sanchez	Associate / Commonwealth of Virginia – 2020	\$375.00	14.7	\$5,512.50
John Girgenti	Staff Attorney / State of New York – 2002 District of Columbia -2007	\$365.00	11.6	\$4,234.00
Stephanie Colcock	Paralegal – Joined firm in 2020	\$330.00	25.7	\$8,481.00
Alyssa Bonesteel	eDiscovery Specialist – Joined firm in 2017	\$315.00	21.2	\$6,678.00
Sherley Martinez	Paralegal – Joined firm in 2017	\$315.00	6.8	\$2,142.00
Katherine Johnson	Paralegal – Joined firm in 2018	\$230.00	59.1	\$13,593.00
Sara Ogrey	Paralegal – Joined firm in 2019	\$230.00	53.0	\$12,190.00
Peggy Holland	Litigation Specialist – Joined firm in 2002	\$290.00	2.2	\$638.00
	<b>Totals</b>		<b>1,037.0</b>	<b>\$822,881.00</b>
	<b>Attorney Blended Rate</b>	<b>\$1,101.92</b>		
	<b>Paraprofessional Blended Rate</b>	<b>\$260.25</b>		

**Exhibit C**

**Summary of Expenses Incurred**

**SUMMARY OF EXPENSES INCURRED**

<b>DESCRIPTION</b>	<b>Total Expenses for Period</b>
Hearing Transcript	\$297.60
Pacer	\$141.40
Westlaw	\$2,968.33
<b>Total</b>	<b>\$3,407.33</b>

**Exhibit D**

**Time and Expense Detail**



700 Pennsylvania Avenue, SE  
Suite 400  
Washington, DC 20003  
O 202.772.2200  
F 202.772.3333  
[GilbertLegal.com](http://GilbertLegal.com)

Ad Hoc Committee  
c/o Marshall S. Huebner  
Davis Polk & Wardwell LLP  
450 Lexington Avenue  
New York, NY 10017

August 3, 2021  
Invoice Number: 11323714  
Client Number: 1599  
Tax ID: 52-2283869

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**FOR PROFESSIONAL SERVICES RENDERED through June 30, 2021**

**Re: Ad Hoc Committee (Purdue)**

<b>Matter Description</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
Purdue Bankruptcy	822,881.00	3,407.33	826,288.33
<b>Total</b>	<b>822,881.00</b>	<b>3,407.33</b>	<b>826,288.33</b>

TOTAL FEES \$ 822,881.00

TOTAL EXPENSES \$ 3,407.33

**TOTAL FEES AND EXPENSES \$ 826,288.33**

**FOR PROFESSIONAL SERVICES RENDERED through June 30, 2021**

**Purdue Bankruptcy**

**A001: Asset Analysis & Recovery**

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Gilbert, S.	6/01/21	Communicate with insurance team re strategy.	.50	850.00
Hudson, J.	6/01/21	Outline response to Insurer #22.	.60	435.00
Hudson, J.	6/01/21	Review course of dealing with Insurer #22.	.80	580.00
Girgenti, J.	6/01/21	Research re Issue #22.	5.00	1,825.00
Girgenti, J.	6/01/21	Revise memorandum re Issue #22.	1.00	365.00
Wolf, D.	6/01/21	Revise settlement agreements re insurance coverage matters.	.30	210.00
Ogrey, S.	6/01/21	Review bankruptcy, adversary, and SDNY dockets re insurance-related pleadings.	.40	92.00
Kaminsky, E.	6/01/21	Draft summary of status of recovery re Insurer #22.	1.90	950.00
Kaminsky, E.	6/01/21	Confer with J. Hudson re recovery from Insurer #22.	.40	200.00
Kaminsky, E.	6/01/21	Confer with A. Kramer and J. Hudson re recovery from Insurer #22.	.40	200.00
Gilbert, S.	6/02/21	Confer with team re status and strategy.	.60	1,020.00
Shore, R.	6/02/21	Confer with bankruptcy team (S. Gilbert, E. Grim, and J. Sanchez), litigation team (J. Rubinstein, A. Gaske, E. Kaminsky), and insurance team (J. Hudson, D. Wolf) re status and strategy.	.60	810.00
Hudson, J.	6/02/21	Confer with bankruptcy team (S. Gilbert, E. Grim, J. Sanchez), litigation team (J. Rubinstein, A. Gaske, and E. Kaminsky), and insurance team (R. Shore and D. Wolf) re status and strategy.	.60	435.00
Hudson, J.	6/02/21	Analyze submission for Insurer #22.	.10	72.50
Grim, E.	6/02/21	Confer with bankruptcy team (S. Gilbert, J. Sanchez), litigation team (J. Rubinstein, A. Gaske, E. Kaminsky), and insurance team (R. Shore, J. Hudson, D. Wolf) re status and strategy.	.60	420.00
Rubinstein, J.	6/02/21	Confer with bankruptcy team (S. Gilbert, E. Grim, J. Sanchez), litigation team (A. Gaske, E. Kaminsky), and insurance team (R. Shore, J. Hudson, D. Wolf) re status and strategy.	.60	480.00
Wolf, D.	6/02/21	Confer with S. Gilbert, R. Shore, J. Rubinstein, J. Hudson, E. Grim, A. Gaske, E. Kaminsky, and J. Sanchez re insurance recovery strategy and plan documents.	.60	420.00
Sanchez, J.	6/02/21	Confer with team re status of insurance strategy.	.40	150.00

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Name	Date	Services	Hours	Amount
Gaske, A.	6/02/21	Confer with bankruptcy team (S. Gilbert, E. Grim, and J. Sanchez), litigation team (J. Rubinstein, J. Hudson, and E. Kaminsky), and insurance team (R. Shore, J. Hudson, and D. Wolf) re status and strategy.	.60	345.00
Ogrey, S.	6/02/21	Review bankruptcy, adversary, and SDNY dockets re insurance-related pleadings.	.30	69.00
Kaminsky, E.	6/02/21	Confer with bankruptcy team (S. Gilbert, E. Grim, H. Frazier, and J. Sanchez), litigation team (J. Rubinstein, A. Gaske, and E. Kaminsky), and insurance team (R. Shore and D. Wolf) re status and strategy.	.60	300.00
Kaminsky, E.	6/02/21	Draft letter to Liquidator re Insurer #22.	1.80	900.00
Ogrey, S.	6/03/21	Review bankruptcy, adversary, and SDNY dockets for insurance-related pleadings.	.50	115.00
Kaminsky, E.	6/03/21	Revise letter to Insurer #22.	1.10	550.00
Wolf, D.	6/04/21	Revise settlement agreements re insurance coverage matters.	1.40	980.00
Martinez, S.	6/04/21	Review database re new financial, insurance, and litigation materials.	.50	157.50
Johnson, K.	6/04/21	Review recent additions to Intralinks for insurance-related materials.	.10	23.00
Ogrey, S.	6/04/21	Review bankruptcy, adversary, and SDNY dockets re insurance-related pleadings.	.30	69.00
Gilbert, S.	6/07/21	Communicate with insurance team re strategy.	.50	850.00
Wolf, D.	6/07/21	Revise settlement agreement documents re insurance coverage matters.	.20	140.00
Johnson, K.	6/07/21	Revise tracking spreadsheet to include new correspondence related to Insurers #3, #11, #23 and #34.	.60	138.00
Gaske, A.	6/07/21	Revise tracking spreadsheet re correspondence from Insurers #3, #6, #11, #23, #24, and #39.	1.50	862.50
Gaske, A.	6/07/21	Revise insurer-specific settlement sheets for Insurers #11, #14, and #38.	1.30	747.50
Gaske, A.	6/07/21	Revise draft confidentiality letter re contact information.	.20	115.00
Ogrey, S.	6/07/21	Review bankruptcy, adversary, and SDNY dockets re insurance-related pleadings.	.40	92.00
Gaske, A.	6/08/21	Revise insurer-specific settlement sheets for Insurers #1, #18, #19, and #20.	2.30	1,322.50
Ogrey, S.	6/08/21	Review bankruptcy, adversary, and SDNY dockets re insurance-related pleadings.	.30	69.00
Hudson, J.	6/09/21	Analyze next steps for insurance recovery.	.10	72.50

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Name	Date	Services	Hours	Amount
Johnson, K.	6/09/21	Review and revise tracking spreadsheet re Insurer #20.	.20	46.00
Johnson, K.	6/09/21	Review Intralinks re insurance and correspondence documents.	.10	23.00
Ogrey, S.	6/09/21	Review bankruptcy, adversary, and SDNY dockets re insurance-related pleadings.	.20	46.00
Johnson, K.	6/10/21	Review and revise tracking spreadsheet re Insurers #2 and #4.	.20	46.00
Gaske, A.	6/10/21	Revise insurer correspondence tracking spreadsheet re summary of correspondence with Insurers #2 and #4.	.60	345.00
Ogrey, S.	6/10/21	Review bankruptcy, adversary, and SDNY dockets for insurance-related pleadings.	.30	69.00
Gilbert, S.	6/11/21	Analyze insurance recovery strategy.	1.00	1,700.00
Hudson, J.	6/11/21	Analyze next steps for insurance recovery.	.20	145.00
Ogrey, S.	6/11/21	Review bankruptcy, adversary, and SDNY dockets for insurance-related pleadings.	.20	46.00
Ogrey, S.	6/11/21	Review correspondence sent to Debtors from various insurers.	3.70	851.00
Shore, R.	6/13/21	Analyze next steps for insurance recovery.	.30	405.00
Gilbert, S.	6/14/21	Confer with bankruptcy and insurance teams re status and strategy.	.20	340.00
Shore, R.	6/14/21	Confer with S. Gilbert, D. Wolf, R. Leveridge, J. Rubinstein, J. Hudson, E. Grim, A. Gaske, E. Kaminsky, and J. Sanchez re insurance recovery strategy.	.20	270.00
Hudson, J.	6/14/21	Confer with Insurer #21 re draft settlement agreement.	.10	72.50
Hudson, J.	6/14/21	Analyze insurance recovery strategy.	.30	217.50
Hudson, J.	6/14/21	Confer with bankruptcy and insurance teams re status and strategy.	.20	145.00
Rubinstein, J.	6/14/21	Confer with team re strategy.	.20	160.00
Wolf, D.	6/14/21	Confer with S. Gilbert, R. Shore, R. Leveridge, J. Rubinstein, J. Hudson, E. Grim, A. Gaske, E. Kaminsky, and J. Sanchez re insurance recovery strategy.	.20	140.00
Sanchez, J.	6/14/21	Confer with bankruptcy, insurance, and litigation teams re next steps for insurance analysis.	.20	75.00
Rush, M.	6/14/21	Confer with team re status and strategy.	.20	135.00
Johnson, K.	6/14/21	Review and revise tracking spreadsheet re materials related to Insurer #31.	.20	46.00
Gaske, A.	6/14/21	Confer with team re status and strategy.	.20	115.00



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Name	Date	Services	Hours	Amount
Leveridge, R.	6/14/21	Confer with team re case strategy and status.	.20	280.00
Ogrey, S.	6/14/21	Review bankruptcy, adversary, and SDNY dockets for insurance-related pleadings.	.30	69.00
Kaminsky, E.	6/14/21	Confer with team re insurance recovery strategy.	.20	100.00
Hudson, J.	6/15/21	Confer with Debtors (A. Kramer and C. Ricarte) re next steps for Insurer #22.	.10	72.50
Hudson, J.	6/15/21	Analyze next steps for insurance recovery.	.10	72.50
Ogrey, S.	6/15/21	Review bankruptcy, adversary, and SDNY dockets for insurance-related pleadings.	.30	69.00
Hudson, J.	6/16/21	Analyze and update insurance-related settlement numbers.	1.00	725.00
Ogrey, S.	6/16/21	Review bankruptcy, adversary, and SDNY dockets for insurance-related pleadings.	.50	115.00
Ogrey, S.	6/16/21	Continue to review and index insurer correspondence.	3.30	759.00
Gaske, A.	6/17/21	Revise coverage charts re presentation to clients.	.30	172.50
Ogrey, S.	6/17/21	Review bankruptcy, adversary, and SDNY dockets for insurance-related pleadings.	.50	115.00
Ogrey, S.	6/21/21	Review bankruptcy, adversary, and SDNY dockets for insurance-related pleadings.	.30	69.00
Ogrey, S.	6/21/21	Continue to review and index insurance correspondence.	1.50	345.00
Ogrey, S.	6/22/21	Review bankruptcy, adversary, and SDNY dockets for insurance-related pleadings.	.30	69.00
Ogrey, S.	6/23/21	Review bankruptcy, adversary, and SDNY dockets re insurance-related pleadings.	.30	69.00
Hudson, J.	6/24/21	Revise outline for next steps for insurance recovery.	3.70	2,682.50
Johnson, K.	6/24/21	Correspond with S. Ogrey re insurer correspondence.	.20	46.00
Ogrey, S.	6/24/21	Review bankruptcy, adversary, and SDNY dockets re insurance-related pleadings.	.40	92.00
Ogrey, S.	6/24/21	Continue to review and index incoming insurer correspondence.	3.20	736.00
Ogrey, S.	6/25/21	Review bankruptcy, adversary, and SDNY dockets re insurance-related pleadings.	.30	69.00
Gaske, A.	6/28/21	Revise insurer correspondence tracking sheet re correspondence from Insurer #14.	.20	115.00
Ogrey, S.	6/28/21	Review bankruptcy, adversary, and SDNY dockets re insurance-related pleadings.	.30	69.00
Hudson, J.	6/29/21	Analyze next steps for insurance recovery.	.10	72.50
Girgenti, J.	6/29/21	Research re Issue #22.	4.20	1,533.00

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Name	Date	Services	Hours	Amount
Girgenti, J.	6/29/21	Revise memorandum re Issue #22.	1.40	511.00
Ogrey, S.	6/29/21	Review bankruptcy, adversary, and SDNY dockets re insurance related pleadings.	.30	69.00
Ogrey, S.	6/29/21	Review and revise schedules of certain insurance policies against policies produced from Ligado.	.70	161.00
Ogrey, S.	6/30/21	Review bankruptcy, adversary, and SDNY dockets re insurance related pleadings.	.30	69.00
Ogrey, S.	6/30/21	Continue to review and revise schedules of certain insurance policies against policies produced from Ligado.	2.20	506.00
<b>Project Total:</b>			<b>65.90</b>	<b>\$ 32,702.50</b>

**A004: Case Administration**

Name	Date	Services	Hours	Amount
Johnson, K.	6/01/21	Review docket and notice re upcoming supplementary hearing (0.5); update case calendar re same (0.3).	.80	184.00
Johnson, K.	6/02/21	Review docket re notice of second supplemental hearing and update case calendar re same.	.10	23.00
Johnson, K.	6/03/21	Update case calendar re confirmation schedule.	.40	92.00
Ogrey, S.	6/04/21	Review order granting motion for order establishing confirmation schedule and protocols (1.0); update case calendar with deadlines (0.6).	1.60	368.00
Johnson, K.	6/07/21	Communicate with J. Hudson and H. Frazier re recent scheduling order.	.10	23.00
Johnson, K.	6/08/21	Review docket and organize pleadings related to motion to assume pre-petition agreement with AHC.	.20	46.00
Ogrey, S.	6/08/21	Update master list of cases against Debtors.	.90	207.00
Johnson, K.	6/14/21	Review notice of agenda re 6/16 hearing and calendar related date.	.20	46.00
Gilbert, S.	6/16/21	Attend hearing re appointing examiner.	2.50	4,250.00
Johnson, K.	6/23/21	Review deadlines and calendar related dates.	.40	92.00
Ogrey, S.	6/24/21	Review and calendar omnibus hearing dates.	.70	161.00
Johnson, K.	6/25/21	Review deadlines and calendar related dates.	.50	115.00
Ogrey, S.	6/25/21	Review and organize confirmation schedule deadlines.	4.10	943.00
Johnson, K.	6/29/21	Review recently filed pleadings and calendar deadlines.	.30	69.00
<b>Project Total:</b>			<b>12.80</b>	<b>\$ 6,619.00</b>

Invoice Number: 11323714  
August 3, 2021

**A006: Employment / Fee Applications**

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Holland, P.	6/21/21	Draft April fee statement.	1.30	377.00
Holland, P.	6/30/21	Finalize April fee statement.	.90	261.00
<b>Project Total:</b>			<b>2.20</b>	<b>\$ 638.00</b>

**A009: Meetings / Communications with AHC & Creditors**

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Hudson, J.	6/08/21	Communicate with AHC re motions to be heard on June 21.	.10	72.50
Shore, R.	6/09/21	Confer with AHC re insurance strategy.	.60	810.00
Hudson, J.	6/09/21	Attend AHC meeting re insurance status.	.60	435.00
Hudson, J.	6/09/21	Communicate with governmental entities re briefing on motions to be heard June 21.	.10	72.50
Frazier, H.	6/09/21	Confer with Committee re strategic issues and upcoming deadlines.	.60	405.00
Hudson, J.	6/13/21	Communicate with governmental claim groups re presentation related to upcoming hearing.	.20	145.00
Hudson, J.	6/13/21	Begin drafting presentation to governmental claimant groups re upcoming hearing.	.10	72.50
Hudson, J.	6/14/21	Communicate with private claims re common interest presentation related to adversary proceeding.	.10	72.50
Gilbert, S.	6/17/21	Confer with AHC re insurance briefing.	1.10	1,870.00
Hudson, J.	6/17/21	Confer with governmental groups re presentation related to June 21 adversary proceeding hearing.	1.10	797.50
Hudson, J.	6/17/21	Confer with private claimant group re presentation related to June 21 adversary proceeding hearing.	1.20	870.00
Leveridge, R.	6/17/21	Participate in briefing with Ad Hoc Committee and others re arguments on 6/21.	1.20	1,680.00
Hudson, J.	6/20/21	Confer with AHC re valuation-related expert report.	.40	290.00
Hudson, J.	6/21/21	Confer with AHC re outcome of hearing.	.30	217.50
Hudson, J.	6/22/21	Confer with AHC re potential next steps in insurance proceeding.	.10	72.50
Quinn, K.	6/23/21	Participate in call with Committee re updates.	1.30	1,430.00
Hudson, J.	6/23/21	Attend Committee meeting re status.	1.30	942.50
Grim, E.	6/23/21	Confer with client re insurance expert report, developments in insurance litigation, and other issues.	1.30	910.00

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<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Sraders, S.	6/29/21	Telephone conference with non-state AHC members re fee agreement.	.40	230.00
Sraders, S.	6/30/21	Confer with AHC re recent developments and strategy for upcoming matters.	1.10	632.50
<b>Project Total:</b>			<b>13.20</b>	<b>\$ 12,027.50</b>

**A019: Plan of Reorganization / Disclosure Statement**

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Gilbert, S.	6/01/21	Correspond and confer with AHC and Debtors re revisions to plan.	1.50	2,550.00
Gilbert, S.	6/01/21	Confer with AHC working group re plan.	1.00	1,700.00
Gilbert, S.	6/01/21	Review and revise disclosure statement.	3.00	5,100.00
Gilbert, S.	6/01/21	Confer with AHC professionals re plan.	1.00	1,700.00
Gilbert, S.	6/01/21	Attend supplemental disclosure hearing (0.8); confer with AHC re same (0.2).	1.00	1,700.00
Gilbert, S.	6/01/21	Confer with Debtors re plan and disclosure statement.	1.00	1,700.00
Quinn, K.	6/01/21	Communicate with team re Sackler language request.	.10	110.00
Shore, R.	6/01/21	Analyze MDT insurance rights and collateral (0.8); communicate with J. Hudson and team re same (0.2).	1.00	1,350.00
Litherland, C.	6/01/21	Communications with J. Hudson, R. Shore, and others re plan provisions related to insurance issues.	.70	980.00
Hudson, J.	6/01/21	Attend supplemental hearing on motion to approve disclosure statement.	.80	580.00
Hudson, J.	6/01/21	Review filings to prepare for supplemental disclosure statement hearing.	.20	145.00
Hudson, J.	6/01/21	Redline insurance provisions of shareholder settlement agreement.	.20	145.00
Hudson, J.	6/01/21	Communicate with team re outcome of supplemental hearing on motion to approve disclosure statement.	.10	72.50
Hudson, J.	6/01/21	Revise insurance-related provisions in plan and disclosure statement.	2.50	1,812.50
Grim, E.	6/01/21	Draft analysis of outstanding expert valuation issues.	.60	420.00
Grim, E.	6/01/21	Review Debtors' new proposed insurer updates (0.2); communicate with team re same (0.2).	.40	280.00

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Name	Date	Services	Hours	Amount
Grim, E.	6/01/21	Attend supplemental disclosure statement hearing.	.80	560.00
Wolf, D.	6/01/21	Communicate with S. Gilbert, J. Hudson, and E. Grim re plan documents re insurance coverage matters.	.20	140.00
Colcock, S.	6/01/21	Review notice of supplemental hearing re disclosure statement.	.20	66.00
Gilbert, S.	6/02/21	Revise disclosure statement and plan (2.2); confer with co-counsel (K. Eckstein, others re same (0.3).	2.50	4,250.00
Gilbert, S.	6/02/21	Confer with A. Preis re disclosure statement revisions.	.50	850.00
Gilbert, S.	6/02/21	Conferences with AHC, private entities and Debtors re plan and disclosure statement.	2.00	3,400.00
Gilbert, S.	6/02/21	Attend continued disclosure statement hearing.	1.70	2,890.00
Shore, R.	6/02/21	Confer with C. Litherland, J. Hudson, and others re plan issues related to entities resolving individual claims and collection of insurance proceeds.	.40	540.00
Litherland, C.	6/02/21	Analyze connection between holder of insurance rights and resolution of claims.	.40	560.00
Litherland, C.	6/02/21	Confer with R. Shore, J. Hudson, and others re plan issues related to entities resolving individual claims and collection of insurance proceeds.	.40	560.00
Litherland, C.	6/02/21	Confer with R. Shore, J. Hudson, K. Quinn, and others re possible mechanisms to address possible issues with claim liquidation.	1.30	1,820.00
Hudson, J.	6/02/21	Analyze potential procedures for post-confirmation insurance recovery.	.80	580.00
Hudson, J.	6/02/21	Revise status of insurance-related tasks leading up to confirmation.	.40	290.00
Hudson, J.	6/02/21	Attend second supplemental disclosure statement hearing.	1.70	1,232.50
Hudson, J.	6/02/21	Redline insurance-related aspects of plan.	.90	652.50
Hudson, J.	6/02/21	Confer with Debtors (S. Massman) re resolving MDT shareholder insurance rights transfer specifics.	.10	72.50
Hudson, J.	6/02/21	Analyze options for providing support for a finding as to the value of the Debtors' liability in the confirmation order.	.10	72.50
Grim, E.	6/02/21	Research potential experts for valuation analysis.	.70	490.00
Grim, E.	6/02/21	Communicate with Debtors re valuation analysis.	.20	140.00
Wolf, D.	6/02/21	Revise settlement agreements re insurance coverage matters.	.50	350.00
Gilbert, S.	6/03/21	Confer with AHC working group re plan negotiations.	.50	850.00

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Name	Date	Services	Hours	Amount
Quinn, K.	6/03/21	Confer with team re co-defendant treatment.	.30	330.00
Quinn, K.	6/03/21	Communicate with R. Shore and J. Hudson re potential experts.	.20	220.00
Shore, R.	6/03/21	Confer with H. Frazier, E. Grim, and J. Hudson re various expert issues (0.4); communicate with S. Gilbert re same (0.4).	.80	1,080.00
Hudson, J.	6/03/21	Review updated schedule for confirmation to address insurance-related items.	.10	72.50
Hudson, J.	6/03/21	Analyze potential designees for valuation experts.	.40	290.00
Grim, E.	6/03/21	Communicate with potential experts re liability valuation.	.90	630.00
Grim, E.	6/03/21	Analyze issues relating to attorney fee fund.	.30	210.00
Grim, E.	6/03/21	Review rules re expert designations.	.20	140.00
Sanchez, J.	6/03/21	Confer with E. Grim re researching issues related to attorney fee fund.	.20	75.00
Frazier, H.	6/03/21	Research re requirements for expert disclosures.	.90	607.50
Frazier, H.	6/03/21	Research potential experts re insurance-related issues.	1.30	877.50
Frazier, H.	6/03/21	Confer with R. Shore, E. Grim and J. Hudson re various expert issues.	.40	270.00
Johnson, K.	6/03/21	Review opioids-related dockets re previous expert witnesses (0.2); review SDNY local rules and past cases re expert designations guidelines (1.1).	1.30	299.00
Colcock, S.	6/03/21	Research potential expert candidates.	.30	99.00
Colcock, S.	6/03/21	Research expert designations examples.	.70	231.00
Gilbert, S.	6/04/21	Confer with DOJ re plan allocation.	.80	1,360.00
Quinn, K.	6/04/21	Correspond with insurance team re valuation provision and expert.	.40	440.00
Shore, R.	6/04/21	Research potential experts for valuation issues (1.4); revise insurance assignment language in plan (0.6).	2.00	2,700.00
Hudson, J.	6/04/21	Analyze options for providing support for a finding as to the value of the Debtors' liability in confirmation order.	.80	580.00
Hudson, J.	6/04/21	Confer with Debtors (E. Vonnegut) re establishing valuation at confirmation.	.10	72.50
Hudson, J.	6/04/21	Revise rider re assignment of Sacklers' coverage rights.	.80	580.00
Hudson, J.	6/04/21	Review background materials for call with potential valuation expert.	.10	72.50
Hudson, J.	6/04/21	Confer with potential valuation experts.	.80	580.00

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Name	Date	Services	Hours	Amount
Grim, E.	6/04/21	Analyze expert issues for liability valuation proceedings.	.80	560.00
Frazier, H.	6/04/21	Analyze issues re necessary expert testimony re insurance issues.	1.70	1,147.50
Frazier, H.	6/04/21	Communications with potential expert re potential engagement.	.40	270.00
Shore, R.	6/07/21	Conferences with E. Vonnegut, M. Tobak, S. Schinfeld, D. Wolf, and J. Hudson re revisions to plan documents.	1.50	2,025.00
Shore, R.	6/07/21	Confer with C. Litherland, H. Frazier, and J. Hudson re potential expert testimony issues.	1.00	1,350.00
Shore, R.	6/07/21	Revise plan provisions relevant to valuation issues.	1.00	1,350.00
Shore, R.	6/07/21	Communications with Debtors and co-counsel re expert designations.	1.50	2,025.00
Hudson, J.	6/07/21	Confer with co-counsel re providing support for a finding as to the value of the Debtors' liability in confirmation order.	.60	435.00
Hudson, J.	6/07/21	Confer with Debtors re providing support for a finding as to the value of the Debtors' liability in confirmation order.	1.60	1,160.00
Hudson, J.	6/07/21	Confer with potential experts re insurance-related confirmation issues.	.60	435.00
Hudson, J.	6/07/21	Review expert designations re plan issues.	.10	72.50
Hudson, J.	6/07/21	Analyze options for providing support for a finding as to the value of the Debtors' liability in confirmation order.	2.80	2,030.00
Wolf, D.	6/07/21	Multiple conferences with E. Vonnegut, M. Tobak, S. Schinfeld, R. Shore, and J. Hudson re revisions to plan documents.	1.50	1,050.00
Frazier, H.	6/07/21	Confer with C. Litherland, R. Shore and J. Hudson re potential expert testimony issues.	1.00	675.00
Frazier, H.	6/07/21	Research re potential experts re valuation and insurance findings.	.80	540.00
Frazier, H.	6/07/21	Confer with potential expert candidate.	.90	607.50
Frazier, H.	6/07/21	Confer with R. Shore, J. Hudson, and C. Litherland re valuation finding and related expert issues.	.80	540.00
Frazier, H.	6/07/21	Confer with counsel for Debtors re valuation finding and related expert issues.	.50	337.50
Frazier, H.	6/07/21	Analyze procedure re retention and payment of potential expert and relevant deadlines re same.	1.60	1,080.00
Frazier, H.	6/07/21	Revise initial expert disclosure.	.30	202.50
Gilbert, S.	6/08/21	Confer with AHC working group re plan negotiations.	.50	850.00

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Name	Date	Services	Hours	Amount
Quinn, K.	6/08/21	Confer with R. Shore, H. Frazier and J. Hudson re valuation expert (0.5); analyze issues re same (0.6); revise draft finding language (0.4).	1.50	1,650.00
Shore, R.	6/08/21	Research potential valuation experts (3.1); communicate with potential candidates (2.9).	6.00	8,100.00
Shore, R.	6/08/21	Confer with H. Frazier, K. Quinn, and J. Hudson re valuation expert issues.	.50	675.00
Hudson, J.	6/08/21	Draft confirmation order section responsive to section 5.2 of plan.	1.20	870.00
Hudson, J.	6/08/21	Confer with Debtors and co-counsel for AHC re securing insurance-related findings in confirmation order.	1.20	870.00
Hudson, J.	6/08/21	Analyze insurance assignment in settlement agreement in preparation for discussion with Sacklers.	.10	72.50
Hudson, J.	6/08/21	Draft summary of valuation parameters for Debtors.	.60	435.00
Hudson, J.	6/08/21	Analyze options and approaches to valuation issue for confirmation hearing.	1.80	1,305.00
Wolf, D.	6/08/21	Revise plan documents re insurance coverage matters.	.70	490.00
Wolf, D.	6/08/21	Confer with E. Vonnegut, M. Tobac, S. Birnbaum, A. Kramer, R. Shore, and J. Hudson re plan documents re insurance coverage matters.	1.20	840.00
Frazier, H.	6/08/21	Confer with R. Shore, K. Quinn, and J. Hudson re valuation expert issues.	.50	337.50
Frazier, H.	6/08/21	Confer with potential expert candidate and J. Hudson re scope of potential engagement.	.80	540.00
Frazier, H.	6/08/21	Analyze issues re potential expert candidate.	.80	540.00
Frazier, H.	6/08/21	Confer with counsel for Debtors re plan section 5.2 and required proof re same.	1.00	675.00
Frazier, H.	6/08/21	Research re confirmation issues including confirmation order language re necessary insurance findings.	1.70	1,147.50
Frazier, H.	6/08/21	Confer with two additional potential expert candidates.	.30	202.50
Frazier, H.	6/08/21	Review expert designations of other parties.	.20	135.00
Rush, M.	6/08/21	Communications with team re valuation issues.	.30	202.50
Johnson, K.	6/08/21	Communicate with H. Frazier re expert designations filings and related confirmation orders.	.40	92.00
Johnson, K.	6/08/21	Review revised dates re expert witnesses.	.30	69.00



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Name	Date	Services	Hours	Amount
Leveridge, R.	6/08/21	Communications with team re valuation issues (0.8); communications with potential experts (0.9); review communications with Debtors' counsel re same (0.2).	1.90	2,660.00
Ogrey, S.	6/08/21	Research expert witnesses for bankruptcy proceeding.	2.80	644.00
Colcock, S.	6/08/21	Draft expert disclosure and report checklist.	1.60	528.00
Colcock, S.	6/08/21	Research retired MDL defense counsel for potential experts.	2.20	726.00
Quinn, K.	6/09/21	Confer with C. Litherland, H. Frazier, and R. Shore re bankruptcy findings.	1.60	1,760.00
Shore, R.	6/09/21	Confer with E. Vonnegut, M. Tobac, S. Birnbaum, A. Kramer, D. Wolf, and J. Hudson re plan documents re insurance coverage matters.	1.10	1,485.00
Shore, R.	6/09/21	Confer with C. Litherland, K. Quinn, and H. Frazier re valuation finding and related expert issues.	1.60	2,160.00
Shore, R.	6/09/21	Confer with J. Rice re potential experts (0.6); communicate with potential experts, including E. Green (0.9).	1.50	2,025.00
Litherland, C.	6/09/21	Confer with K. Quinn, R. Shore and H. Frazier re valuation and expert issues.	1.60	2,240.00
Hudson, J.	6/09/21	Analyze approach to valuation issue at confirmation.	2.90	2,102.50
Hudson, J.	6/09/21	Analyze potential experts on valuation issue.	.40	290.00
Hudson, J.	6/09/21	Confer with co-counsel (Kramer Levin and Brown Rudnick) re valuation expert approach.	1.30	942.50
Hudson, J.	6/09/21	Revise confirmation order section responsive to section 5.2 of plan.	.20	145.00
Hudson, J.	6/09/21	Confer with counsel for Sackler family re finalizing assignment issues.	.50	362.50
Hudson, J.	6/09/21	Confer with Debtors (S. Massman) re "neutrality" and valuation items in plan.	.20	145.00
Hudson, J.	6/09/21	Confer with Debtors re approach to valuation issue at confirmation.	1.00	725.00
Wolf, D.	6/09/21	Confer with J. Dougherty, S. Massman, and J. Hudson re shareholder agreement and insurance coverage matters.	.50	350.00
Wolf, D.	6/09/21	Confer with E. Vonnegut, M. Tobac, S. Birnbaum, A. Kramer, and J. Hudson re plan documents related to insurance coverage matters.	1.10	770.00
Sanchez, J.	6/09/21	Research jurisdictional issues re fee fund.	3.30	1,237.50
Frazier, H.	6/09/21	Confer with C. Litherland, K. Quinn, and R. Shore re valuation finding and related expert issues.	1.60	1,080.00

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Name	Date	Services	Hours	Amount
Frazier, H.	6/09/21	Analyze liquidation analysis in conjunction with evaluation of potential expert testimony re valuation issues.	1.30	877.50
Frazier, H.	6/09/21	Confer with co-counsel re expert retention and scope of engagement issues.	.50	337.50
Frazier, H.	6/09/21	Confer with potential expert candidate.	.20	135.00
Frazier, H.	6/09/21	Confer with Debtors' counsel re findings related to section 5.2 of plan.	.50	337.50
Frazier, H.	6/09/21	Research re potential language for inclusion in confirmation order re finding.	.90	607.50
Frazier, H.	6/09/21	Research re procedure for obtaining necessary insurance findings re valuation.	1.80	1,215.00
Martinez, S.	6/09/21	Review and organize disclosure statement findings of fact from prior confirmed bankruptcies.	1.50	472.50
Johnson, K.	6/09/21	Research confirmation orders in various bankruptcy proceedings in support of disclosure statement findings of fact research.	3.50	805.00
Johnson, K.	6/09/21	Research term sheet between AHC and Debtors.	.10	23.00
Johnson, K.	6/09/21	Confer with S. Colcock and A. Gaske re expert witness.	.40	92.00
Gaske, A.	6/09/21	Confer with S. Colcock and K. Johnson re expert report process.	.40	230.00
Gaske, A.	6/09/21	Review outline re action items for expert reports.	.40	230.00
Leveridge, R.	6/09/21	Confer with D. Greenspan re expert issues.	.50	700.00
Ogrey, S.	6/09/21	Research and review various prior bankruptcy confirmation plans and findings of fact.	2.60	598.00
Colcock, S.	6/09/21	Review Court dockets for confirmation orders relevant to proposed findings.	3.00	990.00
Colcock, S.	6/09/21	Confer with K. Johnson and A. Gaske re expert disclosure and report.	.40	132.00
Colcock, S.	6/09/21	Draft expert materials tracking chart.	1.30	429.00
Quinn, K.	6/10/21	Confer with team re valuation finding.	1.10	1,210.00
Quinn, K.	6/10/21	Revise draft "neutrality" language in plan.	.70	770.00
Shore, R.	6/10/21	Analyze approaches to liability valuation.	1.00	1,350.00
Shore, R.	6/10/21	Confer with H. Frazier, K. Quinn, J. Hudson. and C. Litherland re expert retention issues.	1.10	1,485.00
Litherland, C.	6/10/21	Analysis of valuation / "neutrality" issues and options to address Debtors' related concerns.	1.90	2,660.00
Litherland, C.	6/10/21	Confer with R. Shore, J. Hudson, K. Quinn, and H. Fraser re insurance "neutrality" and expert witness search.	1.10	1,540.00

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<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Litherland, C.	6/10/21	Confer with Debtors' counsel, J. Hudson, H. Fraser and others re valuation evidence and other confirmation hearing planning issues.	.80	1,120.00
Litherland, C.	6/10/21	Revise analysis of confirmation issues to address shifting confirmation evidence planning.	1.00	1,400.00
Litherland, C.	6/10/21	Communications with J. Hudson, R. Shore, and others re expert witness search.	.70	980.00
Hudson, J.	6/10/21	Analyze approach to valuation issue at confirmation.	2.10	1,522.50
Hudson, J.	6/10/21	Analyze approach to "neutrality" issue at confirmation.	.20	145.00
Hudson, J.	6/10/21	Confer with potential expert re approach to valuation issue at confirmation.	.70	507.50
Hudson, J.	6/10/21	Communicate with insurers re next steps for "neutrality" discussion.	.10	72.50
Hudson, J.	6/10/21	Confer with potential expert re approach to valuation issue at confirmation.	.10	72.50
Hudson, J.	6/10/21	Confer with Debtors re approach to valuation issue at confirmation.	.80	580.00
Wolf, D.	6/10/21	Conferences with C. Litherland, R. Shore, K. Quinn, and H. Frazier re confirmation order findings.	1.10	770.00
Wolf, D.	6/10/21	Confer with E. Vonnegut, S. Birnbaum, A. Kramer, C. Litherland, and J. Hudson re plan documents re insurance coverage matters.	.80	560.00
Sanchez, J.	6/10/21	Continue researching jurisdictional issues re attorney fee fund.	1.70	637.50
Frazier, H.	6/10/21	Confer with K. Quinn, C. Litherland, R. Shore, and D. Wolf re claim valuation issues and requirements for related findings and plan language re same.	1.10	742.50
Frazier, H.	6/10/21	Confer with potential expert candidate re scope of retention.	.50	337.50
Frazier, H.	6/10/21	Confer with Debtors' counsel re scope of potential expert testimony and related insurance issues.	.80	540.00
Frazier, H.	6/10/21	Confer with potential expert candidate re status.	.20	135.00
Frazier, H.	6/10/21	Analyze strategic options re next steps in valuation and expert retention.	.40	270.00
Frazier, H.	6/10/21	Analyze issues re "neutrality" language and potential revisions re same.	.40	270.00
Frazier, H.	6/10/21	Confer with R. Shore, K. Quinn, J. Hudson and C. Litherland re expert retention issues.	.60	405.00
Quinn, K.	6/11/21	Analyze potential expert witness issues.	.50	550.00
Quinn, K.	6/11/21	Communicate with R. Shore re draft "neutrality" language.	.10	110.00

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Name	Date	Services	Hours	Amount
Shore, R.	6/11/21	Communicate with team re valuation finding and potential experts (1.4); confer with potential expert (1.1); confer with Debtors' counsel re same (0.5).	3.00	4,050.00
Litherland, C.	6/11/21	Communication with S. Gilbert and others re status of discussions with Debtors' counsel on valuation methodology.	.30	420.00
Litherland, C.	6/11/21	Review current proposed "neutrality" language.	.10	140.00
Litherland, C.	6/11/21	Telephone conferences with E. Vonnegut, R. Shore, and others re alternative valuation evidence options and need for same.	1.20	1,680.00
Hudson, J.	6/11/21	Confer with Debtors (M. Tobak, S. Birnbaum, E. Vonnegut, S. Massman) re support for insurance-related findings of fact in confirmation order.	.50	362.50
Hudson, J.	6/11/21	Analyze approach to "neutrality" issue leading up to confirmation.	.20	145.00
Hudson, J.	6/11/21	Analyze approach to valuation issue at confirmation.	.50	362.50
Hudson, J.	6/11/21	Confer with potential expert re approach to valuation issue at confirmation.	1.10	797.50
Sanchez, J.	6/11/21	Continue researching jurisdictional issues re attorney fee fund.	3.60	1,350.00
Frazier, H.	6/11/21	Communicate with R. Shore and C. Litherland re expert retention issues.	.20	135.00
Hudson, J.	6/12/21	Confer with Debtors (Davis Polk and Reed Smith) re revised insurance "neutrality" language for plan.	.20	145.00
Hudson, J.	6/13/21	Draft potential expert designation to address valuation issue at confirmation.	.30	217.50
Hudson, J.	6/13/21	Communicate with S. Gilbert re update on discussions concerning insurance "neutrality" in plan.	.10	72.50
Frazier, H.	6/13/21	Revise draft expert designation.	.20	135.00
Shore, R.	6/14/21	Confer with H. Frazier and E. Grim re expert designation issues.	.30	405.00
Shore, R.	6/14/21	Review expert selection and draft designation of expert (0.7); confer with S. Birnbaum re same (0.1); revise description of scope of expert testimony (0.4).	1.20	1,620.00
Hudson, J.	6/14/21	Analyze approach to valuation issue at confirmation.	2.60	1,885.00
Hudson, J.	6/14/21	Review confirmation schedule.	.10	72.50
Hudson, J.	6/14/21	Review insurers' designation of expert witness re insurance "neutrality".	.10	72.50

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<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Hudson, J.	6/14/21	Confer with Debtors (D. Kratzer) re insurance "neutrality" provision.	.10	72.50
Hudson, J.	6/14/21	Confer with potential expert re next steps for expert report.	.10	72.50
Grim, E.	6/14/21	Review research re attorney fee fund issues.	1.60	1,120.00
Grim, E.	6/14/21	Communicate with J. Sanchez re research re attorney fee fund issues.	.40	280.00
Grim, E.	6/14/21	Confer with R. Shore and H. Frazier re expert designations and adversary proceeding.	.30	210.00
Grim, E.	6/14/21	Communicate with J. Hudson and H. Frazier re expert designation issues.	.30	210.00
Frazier, H.	6/14/21	Confer with R. Shore and E. Grim re expert designation issues.	.30	202.50
Frazier, H.	6/14/21	Review draft retention procedures and letters re retention and payment of expert.	.70	472.50
Frazier, H.	6/14/21	Confer with potential expert re parameters of potential engagement.	.20	135.00
Colcock, S.	6/14/21	Revise expert materials tracking chart.	.10	33.00
Gilbert, S.	6/15/21	Confer with AHC working group re plan.	1.50	2,550.00
Quinn, K.	6/15/21	Communicate with team re insurer expert designation.	.20	220.00
Shore, R.	6/15/21	Confer with J. Hudson, E. Grim, and H. Frazier re expert report preparation issues (0.3); analyze expert background (0.3).	.60	810.00
Litherland, C.	6/15/21	Communications with J. Hudson, R. Shore and others re insurer "neutrality" expert and our valuation experts.	1.10	1,540.00
Hudson, J.	6/15/21	Confer with E. Grim re developments related to insurance issues in plan documents.	.40	290.00
Hudson, J.	6/15/21	Review potential approaches to "neutrality" issue.	.40	290.00
Hudson, J.	6/15/21	Analyze materials for reference by expert re plan section 5.2.	2.20	1,595.00
Hudson, J.	6/15/21	Analyze background re insurers' "neutrality" expert.	.20	145.00
Hudson, J.	6/15/21	Confer with insurer counsel re potential approaches to "neutrality" in plan.	.70	507.50
Hudson, J.	6/15/21	Review initial outline by expert re plan section 5.2.	.50	362.50
Grim, E.	6/15/21	Confer with J. Hudson re expert issues.	.40	280.00
Grim, E.	6/15/21	Review materials to assess insurer expert re insurance "neutrality".	1.10	770.00
Grim, E.	6/15/21	Review valuation materials for potential production to experts.	1.50	1,050.00

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Name	Date	Services	Hours	Amount
Grim, E.	6/15/21	Review plan and disclosure statement provisions relevant to expert report.	.90	630.00
Grim, E.	6/15/21	Review materials relevant to expert report.	.60	420.00
Grim, E.	6/15/21	Confer with G. Coutts (Houlihan) and B. Bromberg (FTI) re Debtors' liquidation analysis.	.30	210.00
Grim, E.	6/15/21	Confer with D. Maloney (Nathan Associates) re expert report.	.60	420.00
Grim, E.	6/15/21	Confer with Debtor (S. Massman, others) and insurer counsel re insurance "neutrality" language.	.60	420.00
Frazier, H.	6/15/21	Research insurer designated expert re "neutrality" issues.	.80	540.00
Frazier, H.	6/15/21	Analyze issues re potential rebuttal expert re insurance "neutrality".	.40	270.00
Frazier, H.	6/15/21	Confer with team re "neutrality" expert designation and strategic approach to rebuttal.	.30	202.50
Frazier, H.	6/15/21	Confer with J. Hudson, E. Grim, R. Shore re expert report preparation issues.	.30	202.50
Frazier, H.	6/15/21	Confer with D. Maloney, E. Grim, and J. Hudson re expert report issues.	.60	405.00
Frazier, H.	6/15/21	Confer with experts re liquidation analysis issues related to expert report.	.30	202.50
Frazier, H.	6/15/21	Analyze issues re scope of expert report.	.70	472.50
Frazier, H.	6/15/21	Revise draft expert report outline.	.70	472.50
Rush, M.	6/15/21	Communicate with team re expert designations.	.20	135.00
Johnson, K.	6/15/21	Confer with S. Colcock re expert report status and strategy.	.60	138.00
Johnson, K.	6/15/21	Research potential expert witness and organize related material (2.5); review docket re insurance "neutrality" pleadings (0.6).	3.10	713.00
Johnson, K.	6/15/21	Draft spreadsheet re hypothetical liquidation analysis in support of expert witness materials.	.30	69.00
Johnson, K.	6/15/21	Review expert witness correspondence; revise correspondence tracker and related materials.	.30	69.00
Colcock, S.	6/15/21	Confer with J. Hudson re expert witness plan.	.20	66.00
Colcock, S.	6/15/21	Confer with K. Johnson re expert witness materials.	.60	198.00
Gilbert, S.	6/16/21	Confer with counsel for schools re allocation.	.50	850.00
Gilbert, S.	6/16/21	Confer with AHC counsel re confirmation hearing.	1.00	1,700.00
Gilbert, S.	6/16/21	Confer with AHC counsel re plan issues.	1.00	1,700.00
Gilbert, S.	6/16/21	Confer with schools re allocation.	1.00	1,700.00
Litherland, C.	6/16/21	Communications with J. Hudson re basis for expert valuation opinion.	.60	840.00

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Hudson, J.	6/16/21	Analyze expert approach to valuation issue for confirmation.	1.40	1,015.00
Hudson, J.	6/16/21	Analyze next steps for insurance-related negotiations with Sacklers.	.10	72.50
Hudson, J.	6/16/21	Analyze approach to valuation issue for confirmation.	.40	290.00
Grim, E.	6/16/21	Review plan documents and creditor materials for expert report.	3.60	2,520.00
Grim, E.	6/16/21	Review valuation expert retention and timeline.	.40	280.00
Grim, E.	6/16/21	Confer with D. Maloney and J. Horewitz (Nathan Associates) re valuation expert report.	.30	210.00
Grim, E.	6/16/21	Communicate with J. Hudson re follow-up issues from expert call.	.20	140.00
Grim, E.	6/16/21	Confer with co-counsel (S. Schinfeld, G. Cicero, others) re timeline and strategy for expert reports.	1.30	910.00
Wolf, D.	6/16/21	Revise Sackler settlement agreement.	1.90	1,330.00
Frazier, H.	6/16/21	Analyze issues re parameters of expert report.	.30	202.50
Johnson, K.	6/16/21	Review and organize expert witness documents.	.30	69.00
Colcock, S.	6/16/21	Revise expert materials tracking chart re additional materials provided to D. Maloney.	.50	165.00
Gilbert, S.	6/17/21	Confer with AHC working group re plan negotiations.	.50	850.00
Gilbert, S.	6/17/21	Confer with counsel for schools and AHC re allocation.	.50	850.00
Gilbert, S.	6/17/21	Confer with tribes re voting.	1.00	1,700.00
Gilbert, S.	6/17/21	Confer with AHC working group re plan.	1.00	1,700.00
Litherland, C.	6/17/21	Analysis of possible examples re "neutrality" language.	1.80	2,520.00
Litherland, C.	6/17/21	Communications with R. Shore and J. Hudson re valuation expert prior work.	.20	280.00
Hudson, J.	6/17/21	Analyze expert approach to valuation issue for confirmation.	.10	72.50
Hudson, J.	6/17/21	Analyze summary of valuation expert background.	.30	217.50
Hudson, J.	6/17/21	Confer with potential expert re valuation materials and analysis.	1.50	1,087.50
Hudson, J.	6/17/21	Confer with Debtors (Davis Polk) re valuation expert analysis for confirmation.	.10	72.50
Grim, E.	6/17/21	Research issues re attorney fee fund.	1.70	1,190.00
Grim, E.	6/17/21	Revise memorandum re issues relating to attorney fee fund.	3.00	2,100.00
Grim, E.	6/17/21	Confer with experts re valuation report.	.50	350.00

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Grim, E.	6/17/21	Review data and materials for potential production to experts.	3.70	2,590.00
Grim, E.	6/17/21	Confer with J. Hudson re strategy for expert reports.	.30	210.00
Wolf, D.	6/17/21	Revise Sackler settlement agreement re insurance coverage matters.	1.10	770.00
Sanchez, J.	6/17/21	Research jurisdictional issues re attorney fee fund.	4.50	1,687.50
Colcock, S.	6/17/21	Revise expert materials tracking chart re additional materials provided to D. Maloney on 6/17/2021.	.30	99.00
Gilbert, S.	6/18/21	Confer with tribes re plan.	1.00	1,700.00
Gilbert, S.	6/18/21	Confer with schools and PEC re allocation.	.50	850.00
Gilbert, S.	6/18/21	Confer with tribal counsel re plan issues.	1.00	1,700.00
Quinn, K.	6/18/21	Communicate with team re preferred experts.	.20	220.00
Shore, R.	6/18/21	Analyze next steps for valuation expert (1.2); review issues to be resolved via oral argument concerning TIG motion (0.6); confer with Debtors (Davis Polk) re evidence to be presented concerning insurance issues at confirmation (1.2).	3.00	4,050.00
Litherland, C.	6/18/21	Confer with R. Shore, J. Hudson, and others re expert report based on DOJ claim information.	.30	420.00
Litherland, C.	6/18/21	Communications with R. Shore, J. Hudson, and others re possible cross of expert based on prior testimony.	.60	840.00
Hudson, J.	6/18/21	Confer with Debtors (Davis Polk) re DOJ feedback on expert report.	.70	507.50
Hudson, J.	6/18/21	Revise valuation-related expert report.	2.00	1,450.00
Hudson, J.	6/18/21	Review proposed revisions to list of MDT insurance policies.	.10	72.50
Hudson, J.	6/18/21	Review status of discussions with DOJ re valuation-related expert report.	.40	290.00
Hudson, J.	6/18/21	Revise "neutrality" language for discussion with insurers.	.10	72.50
Hudson, J.	6/18/21	Confer with DOJ re use of metrics in valuation-related expert report.	.60	435.00
Hudson, J.	6/18/21	Analyze next steps for insurance-related issues leading up to confirmation.	.20	145.00
Hudson, J.	6/18/21	Confer with potential expert re valuation-related report.	.20	145.00
Hudson, J.	6/18/21	Review updated draft expert report.	.60	435.00
Hudson, J.	6/18/21	Review next steps for shareholder insurance transfer.	.10	72.50
Grim, E.	6/18/21	Confer with Debtors' counsel (E. Vonnegut) re expert reports.	.70	490.00



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Grim, E.	6/18/21	Communicate with S. Gilbert re fee research.	.10	70.00
Grim, E.	6/18/21	Confer with Debtors' counsel (E. Vonnegut) and DOJ counsel (L. Fogelman) re expert report. (partial)	.50	350.00
Grim, E.	6/18/21	Confer with C. Litherland and J. Hudson re valuation expert report.	.40	280.00
Grim, E.	6/18/21	Revise valuation expert report.	1.90	1,330.00
Wolf, D.	6/18/21	Revise Sackler settlement agreement re shareholder insurance rights.	.40	280.00
Quinn, K.	6/19/21	Communicate with team re experts.	.20	220.00
Litherland, C.	6/19/21	Communications with S. Gilbert, K. Quinn, and others re expert and confirmation issues.	.40	560.00
Litherland, C.	6/19/21	Communications with S. Gilbert, R. Shore, J. Hudson, and others re impact of expert prior work.	.40	560.00
Hudson, J.	6/19/21	Confer with expert re valuation-related report.	.90	652.50
Hudson, J.	6/19/21	Analyze next steps for valuation-related expert report.	.10	72.50
Hudson, J.	6/19/21	Analyze next steps for shareholder insurance transfer.	.10	72.50
Grim, E.	6/19/21	Confer with J. Horewitz and D. Maloney (valuation experts) re expert report.	.30	210.00
Frazier, H.	6/19/21	Analyze potential issues for insurance "neutrality" rebuttal report.	.20	135.00
Gilbert, S.	6/20/21	Confer with team re confirmation issues.	1.30	2,210.00
Quinn, K.	6/20/21	Confer with team re plan discussions and expert proposal.	1.30	1,430.00
Shore, R.	6/20/21	Confer with team re next steps re expert report.	1.30	1,755.00
Litherland, C.	6/20/21	Confer with S. Gilbert, R. Shore, J. Hudson, K. Quinn, and others re confirmation preparation issues, expert, and various claimant sensitivities.	1.30	1,820.00
Hudson, J.	6/20/21	Confer with team re valuation-related expert report.	1.30	942.50
Hudson, J.	6/20/21	Analyze next steps for insurance findings at confirmation.	.10	72.50
Hudson, J.	6/20/21	Review valuation-related expert report.	2.30	1,667.50
Hudson, J.	6/20/21	Revise schedule of MDT insurance policies.	.40	290.00
Grim, E.	6/20/21	Revise expert report.	3.50	2,450.00
Grim, E.	6/20/21	Confer with team re valuation expert report.	1.30	910.00
Quinn, K.	6/21/21	Review excluded policies requests.	.30	330.00
Quinn, K.	6/21/21	Revise draft correspondence to AHC re expert report.	.20	220.00

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Shore, R.	6/21/21	Revise expert report (0.8); communicate with client re same (0.2).	1.00	1,350.00
Litherland, C.	6/21/21	Revise expert report.	.80	1,120.00
Litherland, C.	6/21/21	Communication with R. Shore, J. Hudson, R. Leveridge, and others re additional confirmation findings.	.70	980.00
Hudson, J.	6/21/21	Confer with Debtors (E. Vonnegut and M. Tobak) re draft expert report for confirmation.	.10	72.50
Hudson, J.	6/21/21	Confer with Debtors and Sackler counsel re revisions to shareholder insurance assignment provisions.	.30	217.50
Hudson, J.	6/21/21	Revise correspondence to AHC re valuation-related expert report.	.10	72.50
Hudson, J.	6/21/21	Continue reviewing valuation-related expert report.	1.30	942.50
Hudson, J.	6/21/21	Revise plan list of excluded policies.	.30	217.50
Hudson, J.	6/21/21	Revise shareholder insurance assignment provisions.	.40	290.00
Grim, E.	6/21/21	Review plan and disclosure statement for materials relevant to valuation expert report.	2.90	2,030.00
Grim, E.	6/21/21	Revise valuation expert report.	4.40	3,080.00
Grim, E.	6/21/21	Confer with experts (Nathan Associates) and J. Hudson re valuation report (partial).	.40	280.00
Grim, E.	6/21/21	Confer with J. Hudson re valuation expert report.	.50	350.00
Grim, E.	6/21/21	Confer with S. Sraders re insurance-related plan issues and valuation expert report.	.60	420.00
Wolf, D.	6/21/21	Confer with J. Dougherty, D. Porat, D. Kratzer, and J. Hudson re Sackler settlement agreement.	.30	210.00
Wolf, D.	6/21/21	Revise shareholder settlement agreement re insurance.	1.50	1,050.00
Johnson, K.	6/21/21	Research docket from insurer expert's prior case for expert report objections and insurance "neutrality" related documents.	1.60	368.00
Gaske, A.	6/21/21	Research re potential expert witness.	.90	517.50
Ogrey, S.	6/21/21	Review deadlines re experts.	.30	69.00
Sraders, S.	6/21/21	Confer with E. Grim re insurance "neutrality" and claim valuation.	.60	345.00
Sraders, S.	6/21/21	Review plan and disclosure statement to determine value provided to creditors under the plan.	1.80	1,035.00
Sraders, S.	6/21/21	Analyze filings in prior proceeding to determine insurance "neutrality" arguments presented.	2.20	1,265.00
Quinn, K.	6/22/21	Communicate with team re confirmation preparations (0.5); confer with team re same (1.3).	1.80	1,980.00

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Quinn, K.	6/22/21	Communicate with A. Gaske re research assignment.	.20	220.00
Litherland, C.	6/22/21	Communications with R. Shore, J. Hudson, and K. Quinn re tasks related to insurance issues and confirmation preparation issues.	1.70	2,380.00
Hudson, J.	6/22/21	Confer with expert re valuation-related report.	3.10	2,247.50
Hudson, J.	6/22/21	Revise list of MDT insurance policies as part of plan supplement.	.30	217.50
Hudson, J.	6/22/21	Analyze "neutrality" options for plan.	.30	217.50
Hudson, J.	6/22/21	Draft motion re retention of valuation-related expert.	.10	72.50
Grim, E.	6/22/21	Review plan and disclosure statement for materials relevant to valuation expert report.	2.30	1,610.00
Grim, E.	6/22/21	Revise valuation expert report.	4.90	3,430.00
Wolf, D.	6/22/21	Revise shareholder settlement agreement re insurance coverage matters.	.80	560.00
Frazier, H.	6/22/21	Communicate with S. Ogrey, J. Hudson and E. Grim re insurance "neutrality" research.	.20	135.00
Frazier, H.	6/22/21	Analyze issues re "neutrality" language and potential expert re same.	.20	135.00
Johnson, K.	6/22/21	Research docket from prior insurance expert case re pre-trial briefs.	.80	184.00
Johnson, K.	6/22/21	Research expert witness reports re insurance "neutrality" in other bankruptcy courts.	1.00	230.00
Gaske, A.	6/22/21	Research insurance principles relevant to "neutrality" issues in New York.	.50	287.50
Ogrey, S.	6/22/21	Communicate with J. Hudson, H. Frazier, and E. Grim re researching insurance "neutrality" language in other bankruptcy plans.	.20	46.00
Ogrey, S.	6/22/21	Review schedules of certain insurance policies re MTD Bermuda and Debtors' other policies.	4.20	966.00
Ogrey, S.	6/22/21	Review previous bankruptcy plans re insurance "neutrality" language.	4.50	1,035.00
Sraders, S.	6/22/21	Review plan determination re allowed claim amounts.	.40	230.00
Sraders, S.	6/22/21	Analyze insurance "neutrality" filings of insurance experts in prior bankruptcy case.	.80	460.00
Quinn, K.	6/23/21	Review and revise draft expert report re liability finding.	1.20	1,320.00
Quinn, K.	6/23/21	Review analysis of plan treatment of DOJ claims.	.20	220.00
Quinn, K.	6/23/21	Confer with A. Gaske re "neutrality" research issue.	.20	220.00
Quinn, K.	6/23/21	Review initial research response from A. Gaske.	.40	440.00

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Shore, R.	6/23/21	Confer with AHC re status (1.2); review and comment on expert report (1.7); review and comment on task list (0.2); analyze next steps in adversary proceeding (0.4).	3.50	4,725.00
Litherland, C.	6/23/21	Revise draft expert report.	1.10	1,540.00
Hudson, J.	6/23/21	Revise valuation-related report (4.3); communicate with expert re same (0.8).	5.10	3,697.50
Hudson, J.	6/23/21	Analyze issues re retention of valuation-related expert.	.60	435.00
Hudson, J.	6/23/21	Review collateral plan document drafts to confirm inclusion of insurance items.	.30	217.50
Hudson, J.	6/23/21	Review next steps for finalizing shareholder insurance transfer.	.10	72.50
Hudson, J.	6/23/21	Review samples of policies that Debtors have requested to include on excluded party list.	.30	217.50
Grim, E.	6/23/21	Revise valuation expert report.	3.40	2,380.00
Grim, E.	6/23/21	Review plan documents for purposes of drafting expert valuation report.	1.30	910.00
Grim, E.	6/23/21	Revise MDT agreement.	.70	490.00
Wolf, D.	6/23/21	Revise Sackler settlement agreement re insurance matters.	1.40	980.00
Wolf, D.	6/23/21	Review draft expert report re claim valuation.	.20	140.00
Frazier, H.	6/23/21	Review draft expert report re valuation issues.	.80	540.00
Frazier, H.	6/23/21	Research potential rebuttal experts re "neutrality" issues.	.70	472.50
Frazier, H.	6/23/21	Analyze issues re retention agreement and payment of professionals / experts.	.40	270.00
Johnson, K.	6/23/21	Cite check and fact check expert report.	1.00	230.00
Johnson, K.	6/23/21	Research expert report rules re exhibits, attachments and formatting.	1.00	230.00
Gaske, A.	6/23/21	Confer with K. Quinn re "neutrality" research question.	.20	115.00
Gaske, A.	6/23/21	Draft summary of research re "neutrality" issues.	3.20	1,840.00
Gaske, A.	6/23/21	Research re "neutrality" issues.	4.50	2,587.50
Ogrey, S.	6/23/21	Continue to review insurance "neutrality" language in asbestos-related bankruptcies.	8.80	2,024.00
Sraders, S.	6/23/21	Draft expert retention agreement.	2.10	1,207.50
Sraders, S.	6/23/21	Review reports and deposition testimony of potential expert witnesses.	1.70	977.50
Colcock, S.	6/23/21	Review expert report materials.	.60	198.00

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Colcock, S.	6/23/21	Confer with D. Maloney re work product for expert report.	.10	33.00
Quinn, K.	6/24/21	Communicate with team re comments to expert report.	.20	220.00
Shore, R.	6/24/21	Confer with E. Grim re valuation expert report (0.5); review and provide comments on expert report (1.0).	1.50	2,025.00
Shore, R.	6/24/21	Confer with personal injury claimant representatives re valuation expert report.	1.00	1,350.00
Litherland, C.	6/24/21	Final review and comment on expert report and retention letter.	.40	560.00
Hudson, J.	6/24/21	Finalize valuation-related expert report.	1.30	942.50
Hudson, J.	6/24/21	Revise policy list.	.10	72.50
Grim, E.	6/24/21	Revise valuation expert report.	4.40	3,080.00
Grim, E.	6/24/21	Communicate with experts re valuation expert report.	.90	630.00
Grim, E.	6/24/21	Review plan documents for purposes of drafting expert valuation report.	1.90	1,330.00
Grim, E.	6/24/21	Confer with counsel for personal injury claimants (C. Shore, others) re valuation expert report.	.40	280.00
Grim, E.	6/24/21	Confer with R. Shore re valuation expert report.	.50	350.00
Grim, E.	6/24/21	Revise MDT agreement.	1.80	1,260.00
Frazier, H.	6/24/21	Analyze issues re expert report.	.50	337.50
Johnson, K.	6/24/21	Confer with D. Maloney and J. Horewitz re docketed materials.	.10	23.00
Johnson, K.	6/24/21	Continue cite checking and fact checking expert report.	.60	138.00
Sraders, S.	6/24/21	Revise draft expert retention agreement.	.70	402.50
Quinn, K.	6/25/21	Review draft shareholder insurance addendum.	.20	220.00
Quinn, K.	6/25/21	Correspond with team re insurers' designated expert.	.10	110.00
Grim, E.	6/25/21	Revise master TDP and MDT agreement.	2.50	1,750.00
Grim, E.	6/25/21	Confer with team re strategy for adversary proceeding and confirmation process.	.80	560.00
Grim, E.	6/25/21	Analyze issues relating to valuation expert report.	.90	630.00
Grim, E.	6/25/21	Communicate with Debtors re issues relating to valuation expert report.	.40	280.00
Wolf, D.	6/25/21	Revise Sackler settlement agreement.	.90	630.00
Grim, E.	6/28/21	Continue revising TDP and trust agreements.	2.20	1,540.00
Frazier, H.	6/28/21	Review research re direct action claims and related issues.	.60	405.00

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Name	Date	Services	Hours	Amount
Winstead, H.	6/29/21	Review proposed plan fee structure and potential plan confirmation presentation.	1.30	1,235.00
Hudson, J.	6/29/21	Communicate with Debtors, UCC, and MSGE re shareholder insurance rights.	.20	145.00
Hudson, J.	6/29/21	Confer with Sacklers' counsel, Debtors, UCC, and MSGE re shareholder insurance rights.	1.00	725.00
Hudson, J.	6/29/21	Revise list of MDT insurance policies.	.90	652.50
Hudson, J.	6/29/21	Revise MDT agreement.	.10	72.50
Grim, E.	6/29/21	Continue to revise TDP and trust agreements.	2.20	1,540.00
Grim, E.	6/29/21	Review updated attorney fee proposal.	.20	140.00
Wolf, D.	6/29/21	Revise insurance policy list schedules.	.50	350.00
Wolf, D.	6/29/21	Confer with E. Vonnegut, S. Massman, J. Dougherty, D. Porat, A. Kramer, and J. Hudson re Sackler settlement agreement.	1.00	700.00
Sraders, S.	6/29/21	Review provisions of plan re attorney fees.	.60	345.00
Winstead, H.	6/30/21	Conference call with Plan Proponents and P. Weinberger re declaration in favor of fee structure.	1.00	950.00
Winstead, H.	6/30/21	Continue to review plan fee structure and declaration in support.	4.00	3,800.00
Hudson, J.	6/30/21	Revise MDT agreement provisions re insurance.	.50	362.50
Hudson, J.	6/30/21	Revise update to insurers re plan and valuation expert.	.30	217.50
Hudson, J.	6/30/21	Revise list of MDT insurance policies.	.90	652.50
Hudson, J.	6/30/21	Review draft order re expert retention.	.10	72.50
Grim, E.	6/30/21	Continue to revise master TDP and MDT agreements.	2.20	1,540.00
Grim, E.	6/30/21	Analyze plan and creditor trust TDPs for issues relating to insurance recovery.	1.30	910.00
Grim, E.	6/30/21	Confer with G. Cicero and S. Isacharoff re fact witness testimony re attorney fee issues.	1.00	700.00
Frazier, H.	6/30/21	Confer with E. Grim re plan issues.	.50	337.50
Frazier, H.	6/30/21	Analyze potential plan language re insurance proceeds and access to same.	.50	337.50
Sraders, S.	6/30/21	Review insurance "neutrality" research.	.60	345.00
Sraders, S.	6/30/21	Draft supplemental order for reimbursement of expert fees.	.60	345.00
Kaminsky, E.	6/30/21	Revise draft agreement re plan.	4.80	2,400.00
<b>Project Total:</b>			<b>418.30</b>	<b>\$ 340,173.50</b>

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**A020: Insurance Adversary Proceeding**

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Hudson, J.	6/01/21	Revise draft discovery report.	.20	145.00
Hudson, J.	6/01/21	Communicate with team re final review of policy evidence for production.	1.10	797.50
Rubinstein, J.	6/01/21	Review articles re underlying opioid litigation as relates adversary proceeding (0.4); review declaration of E. Mahoney (0.3); finish markup of Chubb reply brief re personal jurisdiction in support of preparation for oral argument (1.2); review Navigators production (0.4); revise status update to court (1.4); continue revising trial outline (1.5); review courtesy copies of pleadings to Court (0.3).	5.50	4,400.00
Johnson, K.	6/01/21	Review and organize insurer policies in response to first request for production (1.0); draft insurer document collection and production index (0.9).	1.90	437.00
Johnson, K.	6/01/21	Revise coverage charts and highlight personal jurisdiction insurers.	1.40	322.00
Bonesteel, A.	6/01/21	Review policies to prepare for production.	6.70	2,110.50
Colcock, S.	6/01/21	Review discovery communication re insurer productions.	.50	165.00
Kaminsky, E.	6/01/21	Draft memorandum re motion for more definite statement argument.	3.20	1,600.00
Kaminsky, E.	6/01/21	Revise Document O re Insurer #34.	.60	300.00
Hudson, J.	6/02/21	Outline items to be addressed in insurance litigation.	.10	72.50
Hudson, J.	6/02/21	Confer with Debtors (A. Kramer) re policy production.	.20	145.00
Rubinstein, J.	6/02/21	Analysis re motion to withdraw reference (0.6); correspond with Debtors' counsel re same (0.2); review tables for Judge Drain courtesy copies of pleadings for June 21 oral argument (1.0); draft team meeting agenda (0.3); access to FTP site re forthcoming Debtors' productions (0.5); revise litigation plan (0.6)	3.20	2,560.00
Rush, M.	6/02/21	Communications with counsel re tables for courtesy copies of briefing.	1.10	742.50
Johnson, K.	6/02/21	Finalize tables of content and tables of authorities in support of materials for Judge Drain for June 21 hearing (0.5); confer with M. Rush re coordination with Reed Smith and review communications from L. Szymanski (0.5); organize personal jurisdiction materials to send to Judge Drain (1.7).	2.70	621.00

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Name	Date	Services	Hours	Amount
Johnson, K.	6/02/21	Confer with A. Bonesteel and S. Colcock re policy listings and coordination of outgoing productions (0.3); organize incoming productions (0.2).	.50	115.00
Bonesteel, A.	6/02/21	Review policies in preparation for production.	4.80	1,512.00
Bonesteel, A.	6/02/21	Confer with K. Johnson and S. Colcock re upcoming productions.	.30	94.50
Colcock, S.	6/02/21	Confer with A. Bonesteel and K. Johnson re policy production.	.30	99.00
Kaminsky, E.	6/02/21	Draft Document O re Insurers #33, #34, #37, #21, and #20.	3.80	1,900.00
Shore, R.	6/03/21	Confer with litigation (M. Rush, J. Rubinstein, E. Kaminsky) and insurance team (J. Hudson, A. Gaske) re status and strategy.	.50	675.00
Hudson, J.	6/03/21	Confer with team re litigation status and strategy.	.50	362.50
Hudson, J.	6/03/21	Analyze most efficient approach to document production.	.10	72.50
Hudson, J.	6/03/21	Confer with Debtors (A. Kramer) re policy production.	.10	72.50
Hudson, J.	6/03/21	Analyze settlement responses received from insurers to date and next steps.	.80	580.00
Rubinstein, J.	6/03/21	Communicate with outside counsel re submission of materials to Court for June 21 hearing (1.4); update litigation team meeting agenda (0.2); confer with team re adversary litigation strategy (0.5); analysis re document repository system (1.4); confer with Debtors' counsel re same (0.1); analysis re June 21 arguments (0.6); review summary of key bankruptcy dates (0.2); analysis of cases cited in reply briefing by insurers in preparation for June 21 hearing (0.7).	5.10	4,080.00
Rush, M.	6/03/21	Communications with counsel re tables for courtesy copies of briefing (0.2); review courtesy materials (1.1).	1.30	877.50
Rush, M.	6/03/21	Review briefing from all parties to prepare for oral argument for personal jurisdiction motions.	2.20	1,485.00
Rush, M.	6/03/21	Confer with team re litigation strategy.	.50	337.50
Rush, M.	6/03/21	Confer with co-counsel re document production issues.	.60	405.00
Johnson, K.	6/03/21	Finalize organization of personal jurisdiction materials to send to Judge Drain.	2.90	667.00
Bonesteel, A.	6/03/21	Review policies in preparation for production.	.50	157.50
Bonesteel, A.	6/03/21	Communicate with team re discovery vendor.	.60	189.00



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Name	Date	Services	Hours	Amount
Gaske, A.	6/03/21	Confer with J. Rubinstein, M. Rush, J. Hudson, R. Shore, E. Kaminsky, and S. Colcock re litigation strategy and status.	.50	287.50
Gaske, A.	6/03/21	Revise insurer-tracking spreadsheet re correspondence with Insurers #1, #8, #9, #18, #19, #20, #31, #38, #37, #26, and #29.	1.90	1,092.50
Gaske, A.	6/03/21	Draft agenda for team meeting.	.40	230.00
Gaske, A.	6/03/21	Review cases cited by insurers in personal jurisdiction reply briefs.	.50	287.50
Colcock, S.	6/03/21	Confer with litigation (M. Rush, J. Rubinstein, E. Kaminsky) and insurance team (R. Shore, J. Hudson, A. Gaske) re status and strategy.	.50	165.00
Colcock, S.	6/03/21	Draft letter to Court re materials for personal jurisdiction motion to be heard on June 21, 2021.	.50	165.00
Kaminsky, E.	6/03/21	Revise memorandum re motion for more definite statement.	1.90	950.00
Kaminsky, E.	6/03/21	Confer with A. Gaske, J. Hudson, J. Rubinstein, R. Shore, and M. Rush re insurance strategy.	.50	250.00
Kaminsky, E.	6/03/21	Draft Document O re Insurers #7, #8, #11, #18, #19, and #20.	2.40	1,200.00
Shore, R.	6/04/21	Analyze insurance status of insurance adversary proceeding and recovery strategy.	1.00	1,350.00
Hudson, J.	6/04/21	Outline responses to settlement communications from various insurers.	1.40	1,015.00
Hudson, J.	6/04/21	Finalize policy production.	.10	72.50
Hudson, J.	6/04/21	Confer with Insurer #12 re potential settlement.	.10	72.50
Rubinstein, J.	6/04/21	Review courtesy copies of pleadings to Court for June 21 hearing (0.4); review TCDI database (0.4); review correspondence re plaintiffs' first production of documents (0.1); revise draft letter to Court prepared by personal jurisdiction insurers re pending motion to seal (0.5); review correspondence re insurer policy productions (0.3); review insurer proposed edits to protective order (0.4); continue revising trial outline (1.4).	3.50	2,800.00
Rush, M.	6/04/21	Review insurers' comments to protective order.	.30	202.50
Rush, M.	6/04/21	Review insurers' draft letter to Court re motion to seal.	.20	135.00
Rush, M.	6/04/21	Confer with S. Colcock and K. Johnson re tracking insurers' responses to complaint.	.50	337.50
Johnson, K.	6/04/21	Confer with S. Colcock and M. Rush re affirmative defenses chart.	.50	115.00
Johnson, K.	6/04/21	Organize recent production correspondence.	.20	46.00

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Name	Date	Services	Hours	Amount
Johnson, K.	6/04/21	Correspond with L. Szymanski and A. Ambeault re courtesy copy of cover letter mailed to Judge Drain (0.1); review and organize policies from AGLIC and Steadfast (0.6); update insurer production tracking chart (0.2).	.90	207.00
Johnson, K.	6/04/21	Revise affirmative defenses chart re tracking insurer answers to original complaint.	3.50	805.00
Bonesteel, A.	6/04/21	Continue reviewing policies in preparation for production.	.40	126.00
Gaske, A.	6/04/21	Analyze responses to insurer letters and status of insurer insolvency proceedings.	1.00	575.00
Gaske, A.	6/04/21	Revise summary page of insurer correspondence tracking sheet.	.50	287.50
Colcock, S.	6/04/21	Confer with K. Johnson and M. Rush re answers / affirmative defenses project.	.50	165.00
Kaminsky, E.	6/04/21	Revise memorandum re motion for more definite statement.	2.80	1,400.00
Kaminsky, E.	6/04/21	Draft Document O re Insurers #7, #8, #11, #18, #19, and #20.	4.90	2,450.00
Hudson, J.	6/06/21	Revise draft discovery report to Judge Drain.	.40	290.00
Rubinstein, J.	6/06/21	Revise letters to Court re motion to seal and discovery progress.	.50	400.00
Leveridge, R.	6/06/21	Review and revise letter from insurers re motion to seal (0.7); communicate with other plaintiffs' counsel re same (0.2).	.90	1,260.00
Leveridge, R.	6/06/21	Review J. Rubinstein edits to draft letter to Judge Drain re status of discovery discussion with the insurers.	.40	560.00
Kaminsky, E.	6/06/21	Draft Document O re Insurers #7, #8, #11, #18, #19, and #20.	2.10	1,050.00
Hudson, J.	6/07/21	Revise confidentiality agreement for insurer negotiations.	.30	217.50
Rubinstein, J.	6/07/21	Review J. Hudson proposed edits to discovery status update to Court (0.3); revise draft letter to Court re motion to seal (0.3); revise litigation plan (0.9); analysis re negotiation of protective order for adversary proceeding (2.1); review correspondence from arbitration-asserting insurers re discovery issues (0.5)	4.10	3,280.00
Rush, M.	6/07/21	Review letter to Court re motion to seal.	.10	67.50
Rush, M.	6/07/21	Review letter from arbitration insurers re discovery.	.10	67.50
Johnson, K.	6/07/21	Confer with L. Szymanski re materials for Judge Drain.	.20	46.00

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Name	Date	Services	Hours	Amount
Johnson, K.	6/07/21	Revise 6/21 hearing materials re motion for personal jurisdiction and unredacted motion and exhibits.	.40	92.00
Johnson, K.	6/07/21	Revise affirmative defenses chart re tracking of insurer answers to original complaint.	2.00	460.00
Leveridge, R.	6/07/21	Review briefing materials to prepare for oral argument on motions to dismiss for lack of personal jurisdiction.	2.40	3,360.00
Leveridge, R.	6/07/21	Communications with Debtors' counsel and insurers' counsel re letter to Court re motion to seal (0.3); revise same (0.8).	1.10	1,540.00
Kaminsky, E.	6/07/21	Revise memorandum re motions argument.	1.70	850.00
Kaminsky, E.	6/07/21	Draft Document O re Insurers #7, #8, #11, #18, #19, and #20.	2.40	1,200.00
Kaminsky, E.	6/07/21	Draft document O re insurers #4, #31, and #37.	2.60	1,300.00
Gilbert, S.	6/08/21	Confer with team re adversary proceeding and preparing for confirmation hearing.	.40	680.00
Gilbert, S.	6/08/21	Confer with insurance team re strategy.	.80	1,360.00
Quinn, K.	6/08/21	Confer with team re adversary proceeding / confirmation hearing preparation (0.4); confer with litigation team re insurance strategy (0.8).	1.20	1,320.00
Shore, R.	6/08/21	Confer with team re adversary proceeding and preparing for confirmation hearing.	.40	540.00
Shore, R.	6/08/21	Confer with team re insurance litigation status and strategy.	.80	1,080.00
Hudson, J.	6/08/21	Confer with team re insurance recovery strategy.	.80	580.00
Hudson, J.	6/08/21	Confer with team re adversary proceeding and preparing for confirmation hearing.	.40	290.00
Rubinstein, J.	6/08/21	Review correspondence with insurer counsel and Debtors' counsel re insurance policy production (0.2); analysis re discovery strategy (1.5); participate in meet-and-confer with insurer counsel re case schedule and proposed protective order (0.7); communications with team re Issue #22 (0.6); revise proposed agenda for June 21 hearing (0.3).	3.30	2,640.00
Rubinstein, J.	6/08/21	Confer with team re adversary proceeding and preparing for confirmation hearing.	.40	320.00
Rubinstein, J.	6/08/21	Confer with team re litigation status and strategy.	.80	640.00
Wolf, D.	6/08/21	Confer with R. Shore, R. Leveridge, J. Rubinstein, J. Hudson, M. Rush, A. Gaske, E. Kaminsky, K. Johnson, S. Martinez, and S. Colcock re insurance recovery strategy.	.80	560.00

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Name	Date	Services	Hours	Amount
Sanchez, J.	6/08/21	Confer with bankruptcy, insurance, and litigation teams re status of insurance strategy.	.80	300.00
Rush, M.	6/08/21	Meet-and-confer with insurers re scheduling and discovery issues.	.70	472.50
Rush, M.	6/08/21	Confer with Reed Smith re meet-and-confer with insurers.	.30	202.50
Rush, M.	6/08/21	Confer with team re insurance recovery strategy.	.80	540.00
Martinez, S.	6/08/21	Confer with R. Leveridge, M. Rush, J. Rubinstein, E. Kaminsky, S. Sraders, K. Johnson, S. Colcock, R. Shore, D. Wolf, J. Hudson, and A. Gaske re status and strategy.	.80	252.00
Martinez, S.	6/08/21	Review and organize MDL motions to dismiss briefing re defense counsel information for potential experts (0.9); draft spreadsheet re same (0.8).	1.70	535.50
Johnson, K.	6/08/21	Confer with litigation team re status and strategy.	.80	184.00
Johnson, K.	6/08/21	Research MDL motion to dismiss briefing and related defense counsel (1.0); prepare spreadsheet of findings (1.5).	2.50	575.00
Johnson, K.	6/08/21	Revise affirmative defenses chart re tracking of insurer answers to original complaint.	.90	207.00
Gaske, A.	6/08/21	Review revised coverage charts re preparation for oral argument.	.60	345.00
Gaske, A.	6/08/21	Review insurance-related documents produced by Debtors re D&O coverage correspondence.	.70	402.50
Gaske, A.	6/08/21	Confer with litigation team re status and strategy.	.80	460.00
Gaske, A.	6/08/21	Confer with team re adversary proceeding and preparing for confirmation hearing.	.40	230.00
Gaske, A.	6/08/21	Communicate with M. Rush and S. Colcock re tracking affirmative defenses.	.30	172.50
Leveridge, R.	6/08/21	Confer with team re status of insurance litigation and strategy.	.80	1,120.00
Leveridge, R.	6/08/21	Review relevant materials for meet-and-confer with non-moving insurers (0.1); participate in meet-and-confer with non-moving insurers re schedule, protective order and discovery (0.7); communications with Debtors' counsel re same (0.3).	1.10	1,540.00
Leveridge, R.	6/08/21	Review briefing and case law to prepare for oral argument opposing motions to dismiss based on personal jurisdiction.	1.40	1,960.00
Leveridge, R.	6/08/21	Review and revise draft agenda provided by Debtors' counsel.	.40	560.00

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Name	Date	Services	Hours	Amount
Colcock, S.	6/08/21	Confer with M. Rush, J. Rubinstein, E. Kaminsky, K. Johnson R. Shore, J. Hudson, D. Wolf, and A. Gaske re status and strategy.	.80	264.00
Kaminsky, E.	6/08/21	Confer with team re status of insurance adversary proceeding.	.80	400.00
Kaminsky, E.	6/08/21	Revise Document O re insurers #8, #11, #19, and #20.	1.90	950.00
Litherland, C.	6/09/21	Communications with R. Leveridge, J. Hudson, R. Shore and others re aggregate claims value issues and supporting testimony.	1.70	2,380.00
Litherland, C.	6/09/21	Communication with J. Rubinstein and others re proposal to share production database.	.30	420.00
Hudson, J.	6/09/21	Confer with J. Davis re potentially resolving motion for more definite statement.	.10	72.50
Hudson, J.	6/09/21	Review briefing and case law to prepare for oral argument on motions for more definite statement.	.30	217.50
Hudson, J.	6/09/21	Confer with A. Kramer re potentially resolving motion for more definite statement.	.20	145.00
Rubinstein, J.	6/09/21	Revise proposed agenda for June 21 hearing (0.6); analysis re historic deposition transcripts (1.7); review insurer proposal re case management schedule and proposed edits to protective order (0.9); analysis re Debtors' proposal re vendor database to store insurer productions (1.3); begin drafting 30(b)(6) deposition topics (0.3).	4.80	3,840.00
Rush, M.	6/09/21	Review discovery material from underlying litigation.	1.50	1,012.50
Rush, M.	6/09/21	Review insurers' revised proposed CMO and proposed response.	.20	135.00
Rush, M.	6/09/21	Communicate with team re document repository.	.30	202.50
Johnson, K.	6/09/21	Correspond with J. Rubinstein re protective order information in main proceeding and MDL (0.2); review previous protective orders and related transcripts (0.5).	.70	161.00
Johnson, K.	6/09/21	Review and revise draft of plaintiffs' proposed pretrial scheduling order.	.20	46.00
Gaske, A.	6/09/21	Analyze documents produced by Debtors (2.0); draft summary of documents (0.4).	2.40	1,380.00
Leveridge, R.	6/09/21	Review briefing and case law to prepare for oral argument personal jurisdiction motions (1.0); revise argument outline (4.1); review outline for motion to stay argument (0.8).	5.90	8,260.00
Kaminsky, E.	6/09/21	Analyze issues re motion for more definite statement hearing in preparation for hearing.	.20	100.00
Kaminsky, E.	6/09/21	Revise Document O for multiple insurers.	1.70	850.00

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Name	Date	Services	Hours	Amount
Kaminsky, E.	6/09/21	Draft memorandum re motion for more definite statement.	2.00	1,000.00
Shore, R.	6/10/21	Confer with J. Hudson, M. Rush, J. Rubinstein, E. Kaminsky, A. Gaske K. Johnson, and S. Colcock re status and strategy.	.50	675.00
Hudson, J.	6/10/21	Confer with litigation team re status and strategy.	.50	362.50
Hudson, J.	6/10/21	Confer with J. Davis and G. DiSpirito re potentially mooted National Union's 12(e) motion.	.40	290.00
Hudson, J.	6/10/21	Review policy evidence and prior relevant correspondence to prepare for call with National Union re resolving motion for more definite statement.	.60	435.00
Rubinstein, J.	6/10/21	Correspond with co-plaintiffs' counsel re document repository for insurer productions (0.8); confer with team re litigation strategy (0.5); revise case management proposal to insurers (0.2); analysis re June 21 hearing agenda (0.5); review Debtors' witness depositions as relates to coverage issues (3.4).	5.40	4,320.00
Rush, M.	6/10/21	Confer with litigation team re case status and strategy.	.50	337.50
Rush, M.	6/10/21	Review e-mails re agenda for motions hearing.	.20	135.00
Johnson, K.	6/10/21	Correspond with J. Rubinstein re transcripts.	.10	23.00
Johnson, K.	6/10/21	Confer with R. Leveridge, R. Shore, J. Rubinstein, J. Hudson, E. Kaminsky, A. Gaske, M. Rush and S. Colcock re litigation status and strategy.	.50	115.00
Johnson, K.	6/10/21	Review 2018-19 Debtors' transcripts.	.10	23.00
Johnson, K.	6/10/21	Revise affirmative defenses chart re tracking insurer answers to original complaint.	4.50	1,035.00
Gaske, A.	6/10/21	Confer with M. Rush, K. Johnson, S. Colcock, E. Kaminsky, R. Leveridge, J. Rubinstein, J. Hudson, and R. Shore re litigation strategy.	.50	287.50
Gaske, A.	6/10/21	Review briefing re argument on certain provision in insurance policies in preparation for oral argument.	.50	287.50
Leveridge, R.	6/10/21	Communicate with co-counsel re planning for pretrial conference and argument on 6/21 (0.8); confer with litigation team re status and strategy (0.5).	1.30	1,820.00
Colcock, S.	6/10/21	Confer with R. Shore, J. Hudson, M. Rush, J. Rubinstein, E. Kaminsky, A. Gaske, and K. Johnson re status and strategy.	.50	165.00
Kaminsky, E.	6/10/21	Confer with team re status and strategy.	.50	250.00
Kaminsky, E.	6/10/21	Meet-and-confer with J. Davis, G. DiSpirito, and J. Hudson re motion for more definite statement.	.40	200.00

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Name	Date	Services	Hours	Amount
Kaminsky, E.	6/10/21	Research re motion for more definite statement.	2.30	1,150.00
Kaminsky, E.	6/10/21	Draft Document O re Insurers #26, #27, and #28.	1.80	900.00
Shore, R.	6/11/21	Analyze insurance recovery strategy and next steps.	.20	270.00
Hudson, J.	6/11/21	Review status of policy productions.	.10	72.50
Hudson, J.	6/11/21	Revise outline for oral argument on motions for more definite statement.	.10	72.50
Hudson, J.	6/11/21	Confer with J. Davis re resolving National Union's 12(e) motions.	.10	72.50
Rubinstein, J.	6/11/21	Establish production bates number prefix (0.2); correspond with insurer counsel re June 21 hearing agenda (0.4); review Debtors' witness depositions as relates to coverage issues (3.0); correspond with insurer counsel re proposed case scheduling order (0.3); analysis re document vendor for production storage (0.4); review supplemental insurer personal jurisdiction discovery responses (0.2).	4.50	3,600.00
Johnson, K.	6/11/21	Revise affirmative defenses chart re tracking of insurer answers to original complaint.	4.00	920.00
Leveridge, R.	6/11/21	Conferences with Debtors' counsel and insurer counsel re agenda for 6/21 hearing and schedule to be proposed to the Court on 6/21.	1.90	2,660.00
Kaminsky, E.	6/11/21	Draft memorandum re motion for more definite statement argument.	3.20	1,600.00
Hudson, J.	6/13/21	Analyze next steps for insurance recovery.	.30	217.50
Rubinstein, J.	6/13/21	Review competing proposals in advance of meet-and-confer with insurer counsel re June 21 hearing agenda (0.6); analysis re proposed protective order (0.3); analysis re discovery vendor arrangements (0.3).	1.20	960.00
Hudson, J.	6/14/21	Revise presentation to creditor constituencies re insurance adversary proceeding.	1.40	1,015.00
Hudson, J.	6/14/21	Confer with counsel for National Union re adjourning motion.	.50	362.50
Hudson, J.	6/14/21	Confer with Debtors (A. Kramer) re impact of pre-petition settlements on adversary proceeding.	.10	72.50

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Rubinstein, J.	6/14/21	Review supplemental personal jurisdiction discovery responses for June 21 hearing preparation (0.4); analysis re document vendor structure (0.6); communications with insurer counsel re proposed scheduling order and preparation re same (1.1); revise draft outline for oral argument re motion to stay in favor of arbitration (1.9); review production decisions including Bates prefix (0.3); review Debtors' witness depositions re insurance adversary proceeding (1.4).	5.70	4,560.00
Rush, M.	6/14/21	Review outline for oral argument re personal jurisdiction.	1.90	1,282.50
Johnson, K.	6/14/21	Review and organize personal jurisdiction discovery response documents.	.50	115.00
Johnson, K.	6/14/21	Communicate with A. Gaske re affirmative defense chart.	.20	46.00
Gaske, A.	6/14/21	Review whether prior settlement agreement with Insurer #31 was provided.	.10	57.50
Gaske, A.	6/14/21	Analyze personal jurisdiction discovery responses from Insurers #26, #30, #37, and #38 (2.0); draft summary of personal jurisdiction productions re same insurers (0.5).	2.50	1,437.50
Gaske, A.	6/14/21	Review chart tracking affirmative defenses of defendant insurers.	.10	57.50
Leveridge, R.	6/14/21	Communications with Debtors' counsel re agenda for 6/21 meeting (0.4); revise proposed schedule for adversary (0.6); communicate with co-counsel and opposing counsel re same (0.4).	1.40	1,960.00
Leveridge, R.	6/14/21	Revise outline for oral argument re personal jurisdiction.	5.30	7,420.00
Shore, R.	6/15/21	Revise client presentation re adversary proceeding (2.2); revise P. Breene oral argument in adversary proceeding (1.5).	3.70	4,995.00
Hudson, J.	6/15/21	Revise summary of discussions to resolve National Union's 12(e) motion.	.10	72.50
Hudson, J.	6/15/21	Confer with J. Davis re resolving National Union's 12(e) motion.	.10	72.50
Hudson, J.	6/15/21	Revise presentation to claimant constituencies re June 21 hearing.	.40	290.00
Hudson, J.	6/15/21	Review case law relevant to motions for more definite statement.	.30	217.50
Hudson, J.	6/15/21	Review outline of argument on arbitration motions.	.80	580.00



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Rubinstein, J.	6/15/21	Review Debtors' deponent transcripts re adversary proceeding (1.5); communicate with insurer counsel and co-plaintiff counsel re proposed scheduling order and June 21 agenda (0.7); analysis re supplemental insurer responses to personal jurisdiction discovery as relates to June 21 hearing (0.3).	2.50	2,000.00
Gaske, A.	6/15/21	Review spreadsheet re Insurer #30 personal jurisdiction discovery responses.	.60	345.00
Gaske, A.	6/15/21	Communicate with R. Leveridge re personal jurisdiction discovery issues.	.70	402.50
Gaske, A.	6/15/21	Revise spreadsheet tracking insurer affirmative defenses.	3.30	1,897.50
Gaske, A.	6/15/21	Research bankruptcy rules and timing re motion to strike (2.6); draft summary of rules (0.5).	3.10	1,782.50
Gaske, A.	6/15/21	Communicate with Court re redacted material.	.50	287.50
Leveridge, R.	6/15/21	Communicate with team re 6/21 arguments (0.3); revise outline for oral argument for personal jurisdiction argument (4.6).	4.90	6,860.00
Shore, R.	6/16/21	Review and comment on P. Breene's argument outline (2.0); participate in call with Debtors' counsel and team re arbitration argument (2.3); review and provide comments on slide deck for presentation to AHC and PI counsel re adversary hearing (1.2).	5.50	7,425.00
Litherland, C.	6/16/21	Conference call with P. Breene, A. Kramer, J. Rubinstein, R. Shore, and others re arbitration argument.	2.30	3,220.00
Hudson, J.	6/16/21	Revise presentation to claimant constituencies re June 21 hearing.	1.50	1,087.50
Hudson, J.	6/16/21	Review argument outline re arbitration motions.	.20	145.00
Hudson, J.	6/16/21	Review draft discovery report to Judge Drain.	.10	72.50
Hudson, J.	6/16/21	Confer with Debtors' counsel (Reed Smith) re argument on arbitration motions.	2.30	1,667.50
Rubinstein, J.	6/16/21	Analyze issues in preparation for June 21 hearing (0.4); revise discovery report to Judge Drain (1.1); analysis re document vendor issues (0.3); correspond with co-plaintiff counsel and insurer counsel re proposed agenda for June 21 hearing (0.4); revise personal jurisdiction oral argument outline (2.1); confer with Debtors' counsel re arbitration oral argument outline (2.3).	6.60	5,280.00
Johnson, K.	6/16/21	Review and organize plaintiffs' opposition materials.	.50	115.00

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Johnson, K.	6/16/21	Communicate with A. Gaske re materials sent to clerk for 6/21 hearing.	.20	46.00
Johnson, K.	6/16/21	Review and organize discovery materials re all insurers and personal jurisdiction-specific insurers.	.70	161.00
Johnson, K.	6/16/21	Review and revise affirmative defenses spreadsheet.	1.00	230.00
Johnson, K.	6/16/21	Revise personal jurisdiction specific coverage charts re insurer highlighting in support of 6/21 hearing.	.30	69.00
Gaske, A.	6/16/21	Revise affirmative defenses tracking spreadsheet.	1.60	920.00
Gaske, A.	6/16/21	Revise oral argument outline to insert certain reference material.	1.50	862.50
Gaske, A.	6/16/21	Communicate with K. Johnson re personal jurisdiction discovery.	.20	115.00
Gaske, A.	6/16/21	Revise spreadsheet tracking insurer affirmative defenses.	1.00	575.00
Leveridge, R.	6/16/21	Confer with Debtors' counsel and team re preparing for motion to stay argument.	2.30	3,220.00
Leveridge, R.	6/16/21	Revise outline for personal jurisdiction argument.	6.20	8,680.00
Quinn, K.	6/17/21	Communicate with team re arbitration motion arguments.	.50	550.00
Shore, R.	6/17/21	Confer with M. Rush, J. Rubinstein, E. Kaminsky, J. Hudson, A. Gaske, S. Martinez, and S. Colcock re status and strategy.	.40	540.00
Shore, R.	6/17/21	Confer with AHC and PI group (separately) re upcoming adversary hearing (1.6); review outline re personal jurisdiction argument (1.1); review background of potential expert witnesses (1.4); review Nestle case re personal jurisdiction (0.6); review decision sent by A. Troop (0.4); review bid-and-ask on "neutrality" issue (0.4).	5.50	7,425.00
Litherland, C.	6/17/21	Communication with J. Hudson, R. Shore, K. Quinn, and others re arbitration argument.	1.30	1,820.00
Hudson, J.	6/17/21	Finalize presentation re June 21 adversary proceeding hearing.	1.60	1,160.00
Hudson, J.	6/17/21	Confer with team re status and strategy.	.40	290.00
Hudson, J.	6/17/21	Review and approve draft notice of adjournment of National Union's 12(e) motion.	.10	72.50
Hudson, J.	6/17/21	Review status of draft outlines for oral arguments on June 21.	.10	72.50

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Rubinstein, J.	6/17/21	Revise personal jurisdiction oral argument outline versions (1.4); review materials and additional relevant case law in preparation for hearing on 6/21 (1.9); review insurer productions (0.7); analysis re document storage issues (0.7).	4.70	3,760.00
Rubinstein, J.	6/17/21	Confer with team re status and strategy.	.40	320.00
Wolf, D.	6/17/21	Confer with R. Shore, R. Leveridge, J. Rubinstein, J. Hudson, S. Sraders, A. Gaske, S. Colcock, and S. Martinez re insurance recovery strategy.	.40	280.00
Rush, M.	6/17/21	Review Supreme Court Nestle decision in preparation for oral argument.	.50	337.50
Rush, M.	6/17/21	Confer with team re status and strategy.	.40	270.00
Rush, M.	6/17/21	Confer with e-discovery consultant re issues with document hosting.	.80	540.00
Martinez, S.	6/17/21	Confer with R. Leveridge, M. Rush, J. Rubinstein, E. Kaminsky, S. Sraders, J. Hudson K. Johnson, S. Colcock, R. Shore, D. Wolf, and A. Gaske re status and strategy.	.40	126.00
Gaske, A.	6/17/21	Review recent Supreme Court decision re jurisdiction (1.2); draft summary of same (0.6).	1.80	1,035.00
Gaske, A.	6/17/21	Confer with team re status and strategy.	.40	230.00
Leveridge, R.	6/17/21	Revise outline for argument (5.7); communications with co-counsel re same (1.1).	6.80	9,520.00
Leveridge, R.	6/17/21	Analyze arguments to be made on 6/21.	1.00	1,400.00
Leveridge, R.	6/17/21	Confer with team re litigation status and strategy.	.40	560.00
Ogrey, S.	6/17/21	Review briefs and replies re motion to arbitrate and plaintiffs' reply in opposition.	.70	161.00
Sraders, S.	6/17/21	Confer with team re recent developments and strategy for upcoming matters.	.40	230.00
Sraders, S.	6/17/21	Review filings in adversary proceeding for upcoming oral argument.	.50	287.50
Colcock, S.	6/17/21	Communicate with S. Ogrey re upcoming arbitration motion hearing preparation.	.40	132.00
Colcock, S.	6/17/21	Confer with team re status and strategy.	.40	132.00
Kaminsky, E.	6/17/21	Confer with team re status and strategy.	.40	200.00
Hudson, J.	6/18/21	Analyze policy evidence to seek to resolve motion for more definite statement with National Union.	.10	72.50
Hudson, J.	6/18/21	Review briefing on TIG motion to provide feedback on argument outline.	.20	145.00
Rubinstein, J.	6/18/21	Analysis re document storage / vendor issues (0.3); analysis re communication from TIG re pending motion (0.4).	.70	560.00

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Leveridge, R.	6/18/21	Revise outline for oral argument on personal jurisdiction motions (3.4); communications with co-counsel re same and motion to stay in favor of arbitration (0.8).	4.20	5,880.00
Kaminsky, E.	6/18/21	Revise memorandum re motion for more definite statement.	1.10	550.00
Hudson, J.	6/19/21	Review briefing and case law to provide feedback for outline for oral argument on arbitration motion.	.60	435.00
Hudson, J.	6/19/21	Revise outline for oral argument on motion to more definite statement.	.50	362.50
Shore, R.	6/20/21	Confer with P. Breene re preparing for 6/21 argument (0.2); review outline and consider points to emphasize (0.8); confer with team re same (1.0).	2.00	2,700.00
Hudson, J.	6/20/21	Confer with team re strategy for 6/21 hearing (1.0); analyze argument on motion for more definite statement (0.5).	1.50	1,087.50
Hudson, J.	6/20/21	Confer with co-counsel re preparing for adversary proceeding hearing.	1.10	797.50
Rubinstein, J.	6/20/21	Review revised arbitration motion oral argument outline (0.8); confer with team re June 21 hearing strategy (1.0); review case law analysis in preparation for June 21 hearing (0.2); analysis of materials in preparation for June 21 hearing (2.0).	4.00	3,200.00
Leveridge, R.	6/20/21	Confer with team re strategy for 6/21 hearing (1.0); continue revising oral argument outlines for personal jurisdiction and motion to stay argument (2.6); confer with co-counsel re motion to stay argument (1.1).	4.70	6,580.00
Quinn, K.	6/21/21	Attend (virtually) hearing re insurers' motion to stay.	4.20	4,620.00
Shore, R.	6/21/21	Attend hearing re adversary proceeding (4.2); confer with C. Litherland re outcome of same (0.5); analyze outcome of hearing (1.0); confer with Debtors' counsel re shareholder insurance rights (0.3).	6.00	8,100.00
Litherland, C.	6/21/21	Confer with R. Shore re ruling on arbitration and response to same.	.50	700.00
Hudson, J.	6/21/21	Review updated materials for reference at adversary proceeding hearing.	.40	290.00
Hudson, J.	6/21/21	Finalize review of outline for argument on motion for more definite statement.	.80	580.00
Hudson, J.	6/21/21	Draft proposed order denying motion for more definite statement.	.50	362.50
Hudson, J.	6/21/21	Outline potential targets for insurers that have most recently reached out re settlement.	.40	290.00

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Name	Date	Services	Hours	Amount
Hudson, J.	6/21/21	Attend adversary proceeding hearing.	4.20	3,045.00
Hudson, J.	6/21/21	Analyze outcome of adversary proceeding hearing.	1.20	870.00
Rubinstein, J.	6/21/21	Review briefings and materials in preparation for hearing (1.3); attend adversary proceeding hearing (4.2); analysis re arbitration order impact re strategy (1.0); communications with team re scheduling order (0.2).	6.70	5,360.00
Johnson, K.	6/21/21	Review and organize incoming insurer productions.	1.50	345.00
Leveridge, R.	6/21/21	Final review or outline and materials re personal jurisdiction motions in preparation for hearing (2.0); participate in hearing on motions in adversary proceeding (4.2); communications with team re outcome of hearing (1.0).	7.20	10,080.00
Sraders, S.	6/21/21	Attend hearing re motion to stay in favor of arbitration (partial).	1.50	862.50
Colcock, S.	6/21/21	Confer with R. Leveridge, J. Hudson, J. Rubinstein, A. Gaske and K. Johnson re hearing outcome and strategy going forward.	.30	99.00
Colcock, S.	6/21/21	Draft proposed order for more definite statement.	.40	132.00
Shore, R.	6/22/21	Analyze outcome of adversary hearing and consider next steps in light of same (2.1); confer with team re same (2.1); confer with other plaintiffs' counsel re same (0.2) ; communicate with team re research re consent to settle/good faith/reasonableness (0.1); communicate with AHC re adversary hearing (0.3); review and provide comments to draft expert report (0.7).	5.50	7,425.00
Litherland, C.	6/22/21	Confer with J. Rubinstein, R. Shore, J. Hudson, R. Leveridge, and E. Grim re rulings on arbitration and results of same.	.90	1,260.00
Litherland, C.	6/22/21	Analyze recent rulings on arbitration.	.60	840.00
Litherland, C.	6/22/21	Confer with R. Leveridge, J. Hudson, and R. Shore re options in light of court ruling on arbitration motions.	1.20	1,680.00
Litherland, C.	6/22/21	Communicate with J. Hudson, R. Shore, and K. Quinn re strategy and near-term tasks related to insurance adversary.	.90	1,260.00
Hudson, J.	6/22/21	Analyze US Lines in comparison to facts here in connection with strategic options following ruling on arbitration motions.	.30	217.50
Hudson, J.	6/22/21	Analyze strategic options following ruling on arbitration motions (0.6); conferences with team re strategy related to arbitration ruling (2.1).	2.70	1,957.50

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Name	Date	Services	Hours	Amount
Hudson, J.	6/22/21	Confer with co-plaintiffs' counsel re strategic options following ruling on arbitration motions.	.80	580.00
Grim, E.	6/22/21	Confer with insurance team re ruling on arbitration briefing and next steps.	.90	630.00
Grim, E.	6/22/21	Analyze potential outcomes from arbitration ruling.	.20	140.00
Rubinstein, J.	6/22/21	Confer with team re strategy (0.9); analysis re potential appeal issues and strategy (5.1); confer with co-plaintiffs' counsel and UCC re strategy (0.7);	6.70	5,360.00
Rush, M.	6/22/21	Analyze issues re interlocutory appeals.	2.00	1,350.00
Rush, M.	6/22/21	Review MDL deposition transcripts.	.50	337.50
Gaske, A.	6/22/21	Research rules for filing a bankruptcy appeal.	1.70	977.50
Leveridge, R.	6/22/21	Confer with co-counsel re ruling on 6/21 (1.2); review legal issues relating thereto, including US Lines decision (3.8); review proposed TIG order (0.2); propose edits re same (0.3); communicate with co-counsel re same (0.2); confer with team re arbitration ruling (0.9).	6.60	9,240.00
Sraders, S.	6/22/21	Communicate with R. Leveridge and J. Hudson re U.S. Lines.	.30	172.50
Sraders, S.	6/22/21	Review U.S. Lines decision.	.20	115.00
Colcock, S.	6/22/21	Research AAA arbitration rules and guidelines.	.90	297.00
Colcock, S.	6/22/21	Draft arbitration timeline.	1.30	429.00
Kaminsky, E.	6/22/21	Draft Document O re Insurer #26.	1.10	550.00
Hudson, J.	6/23/21	Analyze strategic options following ruling on arbitration motions.	1.50	1,087.50
Hudson, J.	6/23/21	Communicate with team re review of policy evidence to provide bates numbers to National Union to resolve motion for more definite statement.	.30	217.50
Rubinstein, J.	6/23/21	Analysis re potential next steps following June 21 rulings (0.7); review draft orders resulting from same (0.3).	1.00	800.00
Rush, M.	6/23/21	Research appellate standards.	2.70	1,822.50
Bonesteel, A.	6/23/21	Communicate with S. Colcock re tracking insurer arbitration.	.50	157.50
Bonesteel, A.	6/23/21	Review Debtors' first production.	1.00	315.00
Gaske, A.	6/23/21	Research decision process for motion for leave to appeal.	.60	345.00
Leveridge, R.	6/23/21	Communications with team re procedural options available to plaintiffs (1.2); review research re same (1.6).	2.80	3,920.00

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Name	Date	Services	Hours	Amount
Leveridge, R.	6/23/21	Review draft order re motion to stay in favor of arbitration (0.2); communication with co-plaintiffs' counsel and opposing counsel re same (0.1); review select pages of transcript re same (0.2).	.50	700.00
Sraders, S.	6/23/21	Analyze ruling re motion to stay in favor of arbitration.	.90	517.50
Colcock, S.	6/23/21	Review order denying motion for more definite statement.	.20	66.00
Kaminsky, E.	6/23/21	Draft Document O re Insurers #16 and #17.	1.50	750.00
Shore, R.	6/24/21	Confer with M. Rush, J. Rubinstein, E. Kaminsky and J. Hudson, A. Gaske, K. Johnson and S. Colcock re status and strategy (1.2); review proposed order re Court ruling (1.0).	2.20	2,970.00
Hudson, J.	6/24/21	Confer with team re litigation status and strategy.	1.20	870.00
Rubinstein, J.	6/24/21	Revise draft orders resulting from June 21 hearing (0.6); analysis re appeal rights and process re arbitration order (1.9); confer with team re strategy (1.2); analysis re document storage and vendor-related issues (0.8); communications with Debtors' counsel re same (0.2).	4.70	3,760.00
Wolf, D.	6/24/21	Confer with R. Shore, R. Leveridge, J. Rubinstein, J. Hudson, M. Rush, S. Sraders, A. Gaske, E. Kaminsky, S. Colcock, S. Martinez, and K. Johnson re litigation strategy re insurance adversary proceeding.	1.20	840.00
Rush, M.	6/24/21	Continue researching appellate standards.	1.40	945.00
Rush, M.	6/24/21	Draft analysis of possible appellate strategies.	2.10	1,417.50
Rush, M.	6/24/21	Communicate with team re document vendors.	.40	270.00
Rush, M.	6/24/21	Confer with team re status and strategy.	1.20	810.00
Martinez, S.	6/24/21	Confer with R. Leveridge, R. Shore, D. Wolf, A. Gaske, M. Rush, J. Rubinstein, E. Kaminsky, S. Sraders, J. Hudson K. Johnson and S. Colcock re status and strategy.	1.20	378.00
Johnson, K.	6/24/21	Organize briefing re motion to stay in favor of arbitration.	.30	69.00
Johnson, K.	6/24/21	Confer with R. Leveridge, R. Shore, J. Rubinstein, J. Hudson, E. Kaminsky, A. Gaske, M. Rush and S. Colcock re case strategy and status.	1.20	276.00
Bonesteel, A.	6/24/21	Review Debtors' first production.	4.50	1,417.50
Gaske, A.	6/24/21	Review draft order re personal jurisdiction motion.	.10	57.50
Gaske, A.	6/24/21	Confer with team re strategy and next steps.	1.20	690.00
Gaske, A.	6/24/21	Research re third prong of interlocutory analysis.	2.20	1,265.00

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Leveridge, R.	6/24/21	Review transcript of 6/21 hearing (2.1); revise proposed order to reflect Court ruling set forth in transcript (0.4); communicate with co-plaintiffs' counsel re same (0.3).	2.80	3,920.00
Sraders, S.	6/24/21	Draft memorandum re Bankruptcy Court interpretation of U.S. Lines.	8.60	4,945.00
Sraders, S.	6/24/21	Confer with team re strategy and next steps in representation.	1.20	690.00
Colcock, S.	6/24/21	Confer with R. Shore, J. Hudson, M. Rush, J. Rubinstein, E. Kaminsky, A. Gaske and K. Johnson re status and strategy.	1.20	396.00
Colcock, S.	6/24/21	Research rules re submitting letters to Court in SDNY.	.30	99.00
Kaminsky, E.	6/24/21	Confer with team re status and strategy.	1.20	600.00
Shore, R.	6/25/21	Review strategy and next steps in light of recent ruling.	3.00	4,050.00
Litherland, C.	6/25/21	Analyze strategy re insurance in light of adversary status, plan status, and requests for some settlement discussions.	1.00	1,400.00
Litherland, C.	6/25/21	Communications with R. Shore and others re steps to assure notice to insurers.	.30	420.00
Rubinstein, J.	6/25/21	Analysis re strategy (1.0); draft process for document production storage (0.7); continue review of Debtors' deposition summaries (1.2); review edits to proposed orders and analyze response to insurer counsel re same (1.0).	3.90	3,120.00
Rush, M.	6/25/21	Analyze appellate options re arbitration ruling.	1.00	675.00
Rush, M.	6/25/21	Communications with team re bankruptcy service lists.	.90	607.50
Rush, M.	6/25/21	Analyze options re document repository.	.60	405.00
Rush, M.	6/25/21	Review transcript of arbitration motion hearing.	.70	472.50
Rush, M.	6/25/21	Confer with team re appellate strategy.	.90	607.50
Bonesteel, A.	6/25/21	Analyze vendor and database options.	.40	126.00
Gaske, A.	6/25/21	Review transcript of June 21 hearing.	.80	460.00
Leveridge, R.	6/25/21	Review legal research re strategy for going forward (2.2); communicate with team re same (0.8); communications with Debtors' counsel re same (0.4).	3.40	4,760.00
Leveridge, R.	6/25/21	Review correspondence from opposing counsel re proposed orders relating to June 21 hearing (0.7); communicate with co-plaintiffs' counsel re alternative language (1.2); communications with opposing counsel re same (0.4).	2.30	3,220.00



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Sraders, S.	6/25/21	Draft memorandum analyzing June 21, 2021 bench ruling.	2.40	1,380.00
Kaminsky, E.	6/25/21	Research civil procedure re appellate options.	2.00	1,000.00
Litherland, C.	6/26/21	Analysis re strategy options related to arbitration ruling.	.40	560.00
Leveridge, R.	6/26/21	Review communication from opposing counsel re proposed order (0.6); draft proposed response to same (1.5).	2.10	2,940.00
Quinn, K.	6/27/21	Communicate with team re interlocutory appeal issue.	.20	220.00
Shore, R.	6/27/21	Review adversary proceeding arbitration ruling.	.20	270.00
Leveridge, R.	6/27/21	Analyze options for proposed order.	.40	560.00
Leveridge, R.	6/27/21	Communicate with team re litigation strategy.	.40	560.00
Shore, R.	6/28/21	Analyze options for appeal (1.2); confer with R. Leveridge re same (0.3); review draft outlines re same (0.5).	2.00	2,700.00
Litherland, C.	6/28/21	Communications with R. Shore, M. Rush, and others re status of order staying adversary for arbitration.	.20	280.00
Rubinstein, J.	6/28/21	Analysis re next steps re June 21 rulings (0.8); review edits to TIG proposed order and arbitration insurer proposed order (0.9); review Debtors' witness deposition summaries (4.0).	5.70	4,560.00
Rush, M.	6/28/21	Continue researching appellate standards.	4.10	2,767.50
Rush, M.	6/28/21	Confer with team re case status and strategy.	.30	202.50
Rush, M.	6/28/21	Draft correspondence to insurer counsel re courtesy copy of bankruptcy filings.	.40	270.00
Rush, M.	6/28/21	Review transcript from arbitration motion hearing.	1.80	1,215.00
Leveridge, R.	6/28/21	Communications with other plaintiffs' counsel and opposing counsel re proposed orders and proposed modifications (1.2); revise same (1.6).	2.80	3,920.00
Leveridge, R.	6/28/21	Communications with opposing counsel and Debtors' counsel re proposed protective order.	.70	980.00
Kaminsky, E.	6/28/21	Revise draft agreement.	2.30	1,150.00
Shore, R.	6/29/21	Analyze next steps in light of June 21 ruling.	1.00	1,350.00
Hudson, J.	6/29/21	Review evidence to demonstrate policy period and moot motion for more definite statement (0.6); confer with counsel for National Union re same (0.3).	.90	652.50
Rubinstein, J.	6/29/21	Review edits to proposed order re stay re TIG.	.30	240.00
Rush, M.	6/29/21	Continue reviewing transcript from arbitration motion hearing.	1.30	877.50

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Rush, M.	6/29/21	Communicate with team re discovery issues.	.20	135.00
Leveridge, R.	6/29/21	Review proposed orders (0.5); communications with co-counsel re same (0.3).	.80	1,120.00
Leveridge, R.	6/29/21	Communicate with team re discovery from non-moving insurers.	.40	560.00
Shore, R.	6/30/21	Confer with AHC re status of adversary proceeding (1.0); revise letter to insurers re status (0.3); review form of proposed order for adversary and provide comments (1.7).	3.00	4,050.00
Hudson, J.	6/30/21	Communicate with team re further review of policy evidence to resolve National Union's motion for more definite statement.	.30	217.50
Hudson, J.	6/30/21	Review insurers' update letter to Judge Briccetti.	.10	72.50
Hudson, J.	6/30/21	Confer with Debtors (Reed Smith) re confirming completeness and clarity of policy production.	.30	217.50
Hudson, J.	6/30/21	Analyze next steps for insurance recovery.	.30	217.50
Rubinstein, J.	6/30/21	Review orders entered re June 21 hearing (0.6); correspond with TIG counsel re edits to proposed order (0.3); review Liberty letter to Judge Briccetti re motion to withdraw reference and analysis re potential draft response submission (0.7); confer with adversary proceeding insurer counsel re protective order (0.5); review Debtors' witness deposition transcripts (1.6).	3.70	2,960.00
Rush, M.	6/30/21	Draft letter to Court re TIG order (2.0); communicate with team re same (1.0).	3.00	2,025.00
Martinez, S.	6/30/21	Draft letters to insurers (QBE UK Limited through Zurich) re materials recently filed in adversary case.	.70	220.50
Bonesteel, A.	6/30/21	Continue to review Debtors' first production.	1.50	472.50
Gaske, A.	6/30/21	Review proposed order re automatic stay.	.60	345.00
Gaske, A.	6/30/21	Review and approve final letters to insurers re status of bankruptcy (2.3); communications with N. Sooy @ Reed Smith re finalizing and sending letters (0.4).	2.70	1,552.50
Leveridge, R.	6/30/21	Communications with TIG counsel and other plaintiffs' counsel with respect to TIG proposed order re motion to lift stay (0.9); draft revised order (0.6); review and revise draft letter to Judge re same (1.3).	2.80	3,920.00
Leveridge, R.	6/30/21	Participate in discovery meet-and-confer re protective order with Debtors' counsel and opposing counsel.	.50	700.00

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<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Leveridge, R.	6/30/21	Communications with team re strategy for moving forward with adversary proceeding and addressing opposing counsel's letter to District Court re Judge Drain's June 21 ruling (0.7); communications with Debtors and UCC counsel re same (0.2).	.90	1,260.00
Colcock, S.	6/30/21	Compare modified order re personal jurisdiction to original order to determine changes entered by Court.	.20	66.00
Colcock, S.	6/30/21	Review docket for Liberty letter to Judge in SDNY.	.10	33.00
Colcock, S.	6/30/21	Confer with M. Rush re TIG response letter filing.	.20	66.00
Colcock, S.	6/30/21	Draft exhibits to TIG response letter filing.	.50	165.00
Colcock, S.	6/30/21	Draft letters to insurers (AIG Specialty through QBE) re materials recently filed in adversary case.	2.60	858.00
Colcock, S.	6/30/21	Confer with R. Leveridge re draft order re TIG.	.20	66.00
Colcock, S.	6/30/21	Review materials in preparation for insurer letters.	.80	264.00
Kaminsky, E.	6/30/21	Communicate with J. Hudson re motion for more definite statement status.	.50	250.00
		Project Total:	524.60	\$ 430,720.50
<b>TOTAL CHARGEABLE HOURS</b>			<b>1,037.00</b>	
<b>TOTAL FEES</b>				<b>\$ 822,881.00</b>

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#### TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Gilbert, S.	36.40	1,700.00	61,880.00
Quinn, K.	20.80	1,100.00	22,880.00
Shore, R.	83.50	1,350.00	112,725.00
Litherland, C.	34.50	1,400.00	48,300.00
Holland, P.	2.20	290.00	638.00
Winstead, H.	6.30	950.00	5,985.00
Hudson, J.	127.60	725.00	92,510.00
Girgenti, J.	11.60	365.00	4,234.00
Grim, E.	85.20	700.00	59,640.00
Rubinstein, J.	100.40	800.00	80,320.00
Wolf, D.	22.70	700.00	15,890.00
Sanchez, J.	14.70	375.00	5,512.50
Frazier, H.	37.90	675.00	25,582.50
Rush, M.	41.20	675.00	27,810.00
Martinez, S.	6.80	315.00	2,142.00
Johnson, K.	59.10	230.00	13,593.00
Bonesteel, A.	21.20	315.00	6,678.00
Gaske, A.	55.60	575.00	31,970.00
Leveridge, R.	96.00	1,400.00	134,400.00
Ogrey, S.	53.00	230.00	12,190.00
Sraders, S.	29.60	575.00	17,020.00
Colcock, S.	25.70	330.00	8,481.00
Kaminsky, E.	65.00	500.00	32,500.00
<b>TOTALS</b>	<b>1,037.00</b>		<b>\$ 822,881.00</b>

#### TASK SUMMARY

Task	Description	Hours	Amount
A001	Asset Analysis & Recovery	65.90	32,702.50
A004	Case Administration	12.80	6,619.00
A006	Employment / Fee Applications	2.20	638.00
A009	Meetings / Communications with AHC & Creditors	13.20	12,027.50
A019	Plan of Reorganization / Disclosure Statement	418.30	340,173.50
A020	Insurance Adversary Proceeding	524.60	430,720.50

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## EXPENSE DETAILS

### E106: Online Research

Date	Description	Task	Amount
6/30/21	Westlaw	E106	2,968.33
6/30/21	PACER	E106	141.40
Sub-Total of Expenses:			\$ 3,109.73

### E116: Trial Transcripts

Date	Description	Task	Amount
5/20/21	Transcript / Veritext - Hearing transcript	E116	108.00
6/21/21	Transcript / Veritext - Hearing transcript	E116	189.60
Sub-Total of Expenses:			\$ 297.60

**TOTAL EXPENSES** **\$ 3,407.33**

**TOTAL FEES AND EXPENSES** **\$ 826,288.33**